

EXHIBIT “A”

08/06/13 e370

SUM-100

SUMMONS
(CITACION JUDICIAL)

NOTICE TO DEFENDANT:**(AVISO AL DEMANDADO):**

TARGET CORPORATE SERVICES; AND DOES 1 THROUGH 10

YOU ARE BEING SUED BY PLAINTIFF:**(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

ELENA REESE

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

FILED

NORTH COUNTY DIVISION
2013 JUL 30 PM 3:44CLERK (10)
SAN DIEGO COUNTY, CA

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case.

AVISO! *Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.*

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. AVISO: Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):

San Diego Superior Court, North County Division
325 S. Melrose, Vista, CA 92081

CASE NUMBER:
(Número de caso)
37-2013-00060117-CU-MC-NC

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
Karen S. Spicker, Esq. SBN 127934 Doan Law Firm, LLP, 2850 Pio Pico Drive, Suite H, Carlsbad, CA 92008

DATE: July 30, 2013
(Fecha)

Clerk, by _____ **C.Terriquez** , Deputy
(Secretario) _____ (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

NOTICE TO THE PERSON SERVED: You are served
1. as an individual defendant.
2. as the person sued under the fictitious name of (specify):

3. on behalf of (specify): *Target Corporate Services, Inc.*

under: CCP 416.10 (corporation) CCP 416.60 (minor)
 CCP 416.20 (defunct corporation) CCP 416.70 (conservatee)
 CCP 416.40 (association or partnership) CCP 416.90 (authorized person)
 other (specify):

4. by personal delivery on (date): *68/06/13*

FILED

NORTH COUNTY DIVISION

2013 JUL 30 PM 3:44

(10)
CLERK-SUPERIOR COURT
SAN DIEGO COUNTY, CA

1 Karen S. Spicker, SBN 127934
2 Doan Law Firm, LLP
2850 Pio Pico Drive, Suite D
Carlsbad, CA 92008
3 Phone (760) 450-3333 • Fax (760) 720-6082
karen@doanlaw.com

5 Attorney for PLAINTIFF
ELENA REESE

8 SUPERIOR COURT FOR THE STATE OF CALIFORNIA
9
10 COUNTY OF SAN DIEGO—NORTH COUNTY JUDICIAL DISTRICT

11 ELENA REESE

) Case No. **37-2013-00060117-CU-MC-NC**

12 Plaintiff,

) COMPLAINT SEEKING MONETARY
13) DAMAGES, STATUTORY DAMAGES,
vs.) INJUNCTIVE RELIEF; AND PUNITIVE
14) DAMAGES; AND DECLARATORY RELIEF,
) FOR:

15 TARGET CORPORATE SERVICES,
INC., and DOES 1 through 10, inclusive;

) 1) VIOLATION OF CAL. CIV. CODE
§1788.17, (under 15 U.S.C. §1692c(a)(2));

16 Defendants.

) 2) VIOLATION OF CAL. CIV. CODE
§1788.17, (under 15 U.S.C. §1692c(c));

) 3) VIOLATION OF CAL. CIV. CODE
§1788.17, (under 15 U.S.C. §1692d(5));

) 4) VIOLATION OF CAL. CIV. CODE
§1788.11(d);
5) VIOLATION OF CAL. CIV. CODE
§1788.11(e);

) 6) VIOLATION OF CAL. CIV. CODE
§1788.14(c);
7) NEGLIGENT VIOLATION OF 47 U.S.C. §227
ET SEQ.;

) 8) WILLFUL AND/OR KNOWING VIOLATION
OF 47 U.S.C. §227 ET SEQ.;

) 9) INVASION OF PRIVACY; and

) 10) INTENTIONAL INFILCTION OF
EMOTIONAL DISTRESS.

25 JURY TRIAL DEMANDED

26 AMOUNT IN CONTROVERSY:

27 In Excess of \$25, 000.00

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COMPLAINT

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I.

INTRODUCTION

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1. Plaintiff ELENA REESE (hereinafter "ELENA REESE" and/or "PLAINTIFF") brings
this lawsuit against the DEFENDANTS, TARGET CORPORATE SERVICES, INC.
and DOES 1-10 INCLUSIVE (hereafter "TARGET" or DEFENDANTS), for violations
of California Civil Codes §§1788.17, 1788.14, 1788.11, 42 U.S.C. §227 *et seq.* and
other torts alleged herein

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9
II.

10 FINDINGS AND PURPOSE OF CALIFORNIA CIVIL CODE §1788 *et seq.*, the RFDCPA

11 2. The California Legislature made the following findings and purpose in creating Civil
12 Code §1788, the RFDCPA:

13 (1) *The banking and credit system and grantors of credit to consumers are*
14 *dependent upon the collection of just and owing debts. Unfair or deceptive*
15 *collection practices undermine the public confidence which is essential to the*
16 *continued functioning of the banking and credit system and sound extensions of*
17 *credit to consumers.*

18 (2) *There is a need to ensure that debt collectors and debtors exercise their*
19 *responsibilities to one another with fairness, honesty and due regard for the*
20 *rights of the other.*

21 (3) *It is the purpose of this title to prohibit debt collectors from engaging in*
22 *unfair or deceptive acts or practices in the collection of consumer debts and to*
23 *require debtors to act fairly in entering into and honoring such debts, as*
24 *specified in this title.*

25
26 3. On September 3, 1999, "urgency legislation" was passed adding Civil Code §1788.17 to
27 the RFDCPA which incorporated therein nearly all of the provisions of the Federal Fair
28 Debt Collection Practices Act ("FDCPA") which also superceded numerous provisions

1 of the RFDCPA, such as Civil Code §1788.14, to the extent inconsistent, and which was
2 enacted in 1977.

3 4. The United States Congress has made the following findings and declaration of
4 purpose under the FDCPA:

5 (a) *Abusive practices. There is abundant evidence of the use of abusive,*
6 *deceptive, and unfair debt collection practices by many debt collectors. Abusive*
7 *debt collection practices contribute to the number of personal bankruptcies, to*
8 *marital instability, to the loss of jobs, and to invasions of individual privacy.*

9 (b) *Inadequacy of laws. Existing laws and procedures for redressing these*
10 *injuries are inadequate to protect consumers.*

11 (e) *Purposes. It is the purpose of this title [15 U.S.C.S. §§1692 et seq.] to*
12 *eliminate abusive debt collection practices by debt collectors, to insure that*
13 *those debt collectors who refrain from using abusive debt collection practices*
14 *are not competitively disadvantaged, and to promote consistent State action to*
15 *protect consumers against debt collection abuses.*

16 III.

17 18 THE TELEPHONE CONSUMER PROTECTION ACT OF 1991

19 (TCPA), 47 U.S.C. §227 GENERALLY

20 5. In 1991, Congress enacted the Telephone Consumer Protection Act, 47 U.S.C. §227
21 (“TCPA”) in response to a growing number of consumer complaints regarding unwanted
22 telemarketing calls and unwanted automated and prerecorded telephone calls, which
23 Congress found to be a costly nuisance and an invasion of privacy to consumers.
24
25 6. In furtherance of this goal, the TCPA regulates, among other things, the use of any
26 automated telephone dialing system or an artificial or prerecorded voice. Specifically,
27 the plain language of section 227(b)(1)(A)(iii) prohibits the use of prerecorded messages
28

1 or autodialers to make any call to a wireless number in the absence of an emergency or
2 without the prior express consent of the called party.

3
4 7. Likewise, section 227(b)(1)(A)(iii) prohibits the use of prerecorded messages in any
5 calls to a residential telephone line in the absence of an emergency, the prior express
6 consent of the called party, or order by the Federal Communications Commission
7 (“FCC”).

8
9 8. The FCC, which pursuant to the statute has prescribed various regulations implementing
10 the TCPA requirements, held in a recent FCC Declaratory Ruling that prerecorded
11 message calls to a wireless number by a creditor for (or on behalf of a creditor) are
12 permitted only if the calls are made with “prior express consent” of the called party.
13 The FCC held “the creditor should be responsible for demonstrating that the consumer
14 provided prior express consent. The creditors are in the best position to have records
15 kept in the usual course of business showing such consent . . .” In re Rules
16 Implementing the Tel. Consumer Prot. Act of 1991, 23 F.C.C.R. 559, 564 (2007).

17 9. Prior express consent is “deemed to be granted only if the wireless number was provided
18 by the consumer to the creditor, and such number was provided during the transaction
19 that resulted in the debt owed.” Id. at 564-65.

20 10. Although a person who knowingly provides his or her wireless telephone number to a
21 creditor may have consented to receive telephone calls at the number regarding the debt,
22 such consent may be revoked by further instruction from the consumer. Id. at 564.
23 According to the FCC’s ruling, any claim that the knowing release of a phone number
24 has given effect to an invitation to be called at the number only exists “absent
25 instructions to the contrary.” Id. A written cease and desist order advises a creditor to
26 stop calling and serves to revoke any prior consent.

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IV.

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JURISDICTION

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11. Jurisdiction of this Court arises under California Code Civil Procedure section 410.10 *et seq.*

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V.

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PARTIES

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12. At all times alleged herein, Plaintiff was an individual residing in the City of Encinitas,
20
County of San Diego, State of California and from whom Defendants sought to collect a
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consumer debt which was due and owing from Plaintiff or alleged to be due and owing
22
from Plaintiff. Plaintiff is a "debtor," as that term is defined by California Civil Code
23
§1788.2(h).

24
13. Plaintiff is informed and believes, based and thereon alleges, that Defendant TARGET
25
is in the business of issuing and/or servicing credit cards for individuals residing in the
26
County of San Diego, State of California.

27
14. Defendants and each of them are not an attorney or counselor at law, and in the ordinary
28
course of business Defendants regularly engage in debt collection as that term is defined
in California Civil Code §1788.2. Defendants and each of them are a "debt collector," as
that term is defined by California Civil Code §1788.2(c) and each Defendant is a
"person" as that term is defined by California Civil Code §1788.2(g).

15. Defendants and each of them are and at all times mentioned here were a "corporation"
and a "person" as defined by 47 U.S.C. §153(13) and (32).

16. All telephone contacts by Defendants to Plaintiff occurred on Plaintiff's cellular and/or
residential telephone via an "automated telephone dialing system" and/or used an
"artificial or prerecorded voice" as defined by 47 U.S.C. §227(a)(1) and (b)(1)(A).

28
///

- 1 17. All calls that are the subject of this complaint occurred within one year of filing this
- 2 complaint.
- 3 18. The true names and capacities, whether individual, corporate, associate or other, of the
- 4 defendants sued herein as Does 1 through 10, inclusive, are unknown to Plaintiff. When
- 5 the true names and capacities of such defendants are ascertained, Plaintiff shall amend
- 6 this complaint to allege the same. Plaintiff is informed and believes, and based thereon
- 7 alleges, that each such fictitiously named defendant herein is responsible for each of the
- 8 acts and omissions alleged herein.
- 9 19. For purposes of this Complaint, unless otherwise indicated, "Defendants" includes all
- 10 agents, employees, officers, members, directors, heirs, successors, assigns, principals,
- 11 trustees, sureties, subrogees, representatives, and insurers of Defendants and each of
- 12 them herein.
- 13 20. The Defendants, and each of them, were acting on their own behalf and as the agents,
- 14 servants, partners, joint venturers, and employees of each other, and within the scope of
- 15 their agency, authority and employment.
- 16 21. This case involves money, property or their equivalent, due or owing or alleged to be
- 17 due or owing from a natural person by reason of a consumer credit transaction. As such,
- 18 this action arises out of a "consumer debt" and "consumer credit" as those terms are
- 19 defined by California Civil Code §1788.2(f).
- 20
- 21

22 VI.

23 FACTS

24 Plaintiff Retained Doan Law Firm, LLP

- 25 22. Defendants allege that Plaintiff incurred a "debt" with Defendants and each of them, as
- 26 that term is defined by California Civil Code §1788.2(d) and 15 U.S.C. §1692a(5).
- 27
- 28

1 23. On January 29, 2013, Plaintiff retained DOAN LAW FIRM, LLP to dispute the validity
2 of the debt, to end communications on the debt under the RFDCPA, to eliminate all
3 personal liability on the debt via Title 11 of the United States Code, to ensure that
4 creditors accurately and completely report account information to each credit reporting
5 bureau, as well to expressly revoke consent, if any, given by the Plaintiff to have
6 Defendants communicate directly with Plaintiff.
7

8 24. Specifically, DOAN LAW FIRM, LLP was retained to provide the following seven (7)
9 services:

10 1) Stop all future communications and harassment from creditors using Civil Code
11 §1788.14 and §1788.17 of the RFDCPA, (under 15 U.S.C. §1692 *et seq.*);
12 2) Dispute the validity of the debt alleged based on 15 U.S.C. §§1692c and 1692d,
13 among other things, the statute of frauds, standing in light of securitization, set
14 off rights, improper fees and interest charges and other state and federal statutes;
15 3) Ensure that creditors comply with Civil Code §1785.25(a) and correctly and
16 accurately report to credit reporting agencies information about Plaintiff's
17 account, and fact that the enforceability was disputed;
18 4) Eliminate personal liability using Title 11 of the U.S. Code;
19 5) Ensure that creditors comply with Civil Code §1785.25 and the Fair Credit
20 Reporting Act (FCRA);
21 6) Expressly revoke any prior consent for the purposes of the TCPA; and
22 7) Stop any and all future communications and harassments by creditors using
23 prerecorded messages and automatic dialing systems as prohibited under the TCPA.
24

25 25. Plaintiff paid money to DOAN LAW FIRM, LLP for the foregoing services.
26 26. The purported debt owed to Defendants was the subject of a Chapter 7 Bankruptcy and
27 has since been discharged.
28

1 27. Defendants have no further contractual rights to enforce the debt against Plaintiff and
2 Plaintiff has no obligation to pay Defendants.
3

4 Legal Help Was Provided To Protect Plaintiff From Defendants:
5

6 28. DOAN LAW FIRM, LLP sent TARGET one (1) written "Cease and Desist Order" by
7 regular mail with Proof of Service on February 8, 2013. True and correct copies of the
8 one (1) Cease and Desist Order and Proof of Service is attached hereto collectively as
9 Exhibit "A" and incorporated herein.

10 29. The written Order to Defendants specifically provided the following:
11 a) Plaintiff would soon be filing for Title 11 Federal Protection;
12 b) Advised that Plaintiff refused to pay the debt;
13 c) Advised that Plaintiff disputed the validity of the debt;
14 d) Advised that Plaintiff was now represented by an attorney, DOAN LAW FIRM,
15 LLP with respect to the debt;
16 e) Ordered that Defendants Cease and Desist all further communications with
17 Plaintiff with respect to the debt; and
18 f) Advised that billing statements should be sent to a new address at 2850 Pio Pico
19 Drive, Suite D, Carlsbad, CA 92008.
20

21 Defendants Had Actual Knowledge Of Attorney Representation
22

23 30. Defendants physically received and had actual knowledge of the Cease and Desist
24 Order.
25 31. Defendants had actual knowledge of attorney representation by the DOAN LAW FIRM,
26 LLP.
27 32. Defendants actually knew they had to Cease and Desist all further communications
28 with Plaintiff with respect to the debt.

1 33. Defendants actually knew Plaintiff refused to pay the debt.
2 34. Defendants actually knew that Plaintiff disputed the validity of the debt.
3 35. Defendants actually knew Plaintiff was preparing to file for Federal Relief under Title
4 11.
5 36. Defendants actually knew they were now prohibited from contacting Plaintiff by all
6 means.
7 37. Defendants actually knew they could no longer call, write, send billing statements,
8 statements of account, or any other communication, except legal process to Plaintiff.
9 38. Defendants knew they could only communicate with DOAN LAW FIRM, LLP.
10 39. Defendants knew they could only call, write, send billing statements, and send
11 statements of account, to the DOAN LAW FIRM, LLP at the new address provided.
12 40. The Official Staff Commentary on Regulation Z 226.2(a)(22)-2 specifically provides:
13 *"An attorney and his or her client are considered to be the same person for
14 purpose of this regulation when the attorney is acting within the scope of the
15 attorney-client relationship with regard to a particular transaction."*
16 41. Defendants knew that any further communications of any kind with Plaintiff was
17 prohibited, unlawful, illegal, and would subject them to damages.
18
19

20 DEFENDANTS Committed at least one hundred eighty-two (182) Unlawful Communications
21

22 42. Defendants intentionally, willfully, deliberately, and knowingly refused to abide by the
23 laws of the RFDCPA, FDCPA, and TCPA, as set forth in the Cease and Desist Order
24 and communicated with Plaintiff in regard to the alleged debt.
25 43. Specifically, Defendants communicated with Plaintiff, as further evidenced by the
26 subpoenaed phone records. True and correct copies of the same are attached hereto as
27 Exhibit "B" and incorporated herein.
28

44. Defendants continued to make phone calls to Plaintiff from July 1, 2012 through February 4, 2013.
45. Defendants frequently and repeatedly called Plaintiff at least 5 (five) days in a row from July 1, 2012 through February 4, 2013.
46. Defendants called an unreasonable number of times, of at least four (4) calls per day, on several occasions from July 1, 2012 through February 4, 2013.
47. Defendants continued to call in violation of the TCPA.
48. The numerous communications evidence a pattern and practice wherein Defendants engaged in unlawful harassment and abuse to coerce payment.
49. Upon receiving payment, Defendants represented that the harassment and abuse would stop and Defendants would restore to Plaintiff her right to privacy and peace of mind.
50. The unlawful contacts by Defendants can be summarized by the following chart:

RFDCPA/TCPA Violations

Reese v. Target

Exhibit "A"
Cease and Desist Order
Dated February 8, 2013

"Exhibit B"

	<u>Dialed Number</u>	<u>Date</u>	<u>Time</u>	<u>Calling Number</u>	<u>Calling Party Name</u>
1	6193684282	7/1/12	8:19 AM	6123075885	Target Card Services
2	6193684282	7/7/12	10:24 AM	6123075885	Target Card Services
3	6193684282	7/7/12	1:17 PM	6123075885	Target Card Services
4	6193684282	7/8/12	10:27 AM	6123075885	Target Card Services
5	6193684282	7/8/12	4:45 PM	9528520003	Target Card Services
6	6193684282	7/12/12	4:19 PM	9528520003	Target Card Services
7	6193684282	7/13/12	11:54 AM	9528520003	Target Card Services
8	6193684282	7/13/12	2:28 PM	9528520003	Target Card Services
9	6193684282	7/15/12	10:21 AM	6123075885	Target Card Services
10	6193684282	7/15/12	4:44 PM	9528520003	Target Card Services
11	6193684282	7/21/12	8:39 AM	6123075885	Target Card Services

1	12	6193684282	7/21/12	10:57 AM	6123075885	Target Card Services
2	13	6193684282	7/21/12	12:37 PM	6123075885	Target Card Services
3	14	6193684282	7/22/12	12:14 PM	6123075885	Target Card Services
4	15	6193684282	7/22/12	4:16 PM	9528520003	Target Card Services
5	16	6193684282	7/23/12	2:12 PM	9528520003	Target Card Services
6	17	6193684282	7/24/12	4:29 PM	9528520003	Target Card Services
7	18	6193684282	7/25/12	5:11 PM	9528520003	Target Card Services
8	19	6193684282	7/28/12	8:10 AM	6123075885	Target Card Services
9	20	6193684282	7/28/12	10:53 AM	6123075885	Target Card Services
10	21	6193684282	7/28/12	4:54 PM	6123075885	Target Card Services
11	22	6193684282	7/29/12	8:15 AM	6123075885	Target Card Services
12	23	6193684282	7/30/12	6:21 PM	9528520003	Target Card Services
13	24	6193684282	7/31/12	2:16 PM	9528520003	Target Card Services
14	25	6193684282	8/4/12	10:22 AM	6123075885	Target Card Services
15	26	6193684282	8/4/12	12:04 PM	6123075885	Target Card Services
16	27	6193684282	8/5/12	3:56 PM	9528520003	Target Card Services
17	28	6193684282	8/6/12	2:52 PM	9528520003	Target Card Services
18	29	6193684282	8/9/12	4:25 PM	9528520003	Target Card Services
19	30	6193684282	8/11/12	9:36 AM	6123075885	Target Card Services
20	31	6193684282	8/11/12	12:22 PM	6123075885	Target Card Services
21	32	6193684282	8/12/12	5:20 PM	9528520003	Target Card Services
22	33	6193684282	8/13/12	2:25 PM	9528520003	Target Card Services
23	34	6193684282	8/15/12	12:28 PM	9528520003	Target Card Services
24	35	6193684282	8/18/12	9:32 AM	6123075885	Target Card Services
25	36	6193684282	8/18/12	1:06 PM	6123075885	Target Card Services
26	37	6193684282	8/19/12	10:50 AM	6123075885	Target Card Services
27	38	6193684282	8/20/12	5:57 PM	9528520003	Target Card Services
28	39	6193684282	8/22/12	2:19 PM	9528520003	Target Card Services
	40	6193684282	8/25/12	8:53 AM	6123075885	Target Card Services
	41	6193684282	8/25/12	1:13 PM	6123075885	Target Card Services
	42	6193684282	8/26/12	9:25 AM	6123075885	Target Card Services
	43	6193684282	9/1/12	8:13 AM	6123075885	Target Card Services
	44	6193684282	9/2/12	8:12 AM	6123075885	Target Card Services
	45	6193684282	9/4/12	11:00 AM	6237921070	Target Card Services
	46	6193684282	9/4/12	1:52 PM	6237921070	Target Card Services
	47	6193684282	9/5/12	12:08 PM	6237921070	Target Card Services
	48	6193684282	9/5/12	4:05 PM	6237921070	Target Card Services
	49	6193684282	9/6/12	11:06 AM	6123078559	Target Card Services
	50	6193684282	9/6/12	12:34 PM	6123078559	Target Card Services
	51	6193684282	9/6/12	2:38 PM	9528520005	Target Card Services
	52	6193684282	9/7/12	11:58 AM	6237921070	Target Card Services
	53	6193684282	9/8/12	11:26 AM	6237921070	Target Card Services
	54	6193684282	9/10/12	4:53 PM	9528520005	Target Card Services
	55	6193684282	9/11/12	12:14 PM	6237921070	Target Card Services

COMPLAINT

1	56	6193684282	9/12/12	11:41 AM	6123078559	Target Card Services
2	57	6193684282	9/12/12	5:10 PM	6123078559	Target Card Services
3	58	6193684282	9/13/12	12:04 PM	6123078559	Target Card Services
4	59	6193684282	9/13/12	4:54 PM	9528520005	Target Card Services
5	60	6193684282	9/14/12	12:49 PM	6237921070	Target Card Services
6	61	6193684282	9/15/12	11:23 AM	6237921070	Target Card Services
7	62	6193684282	9/15/12	12:42 PM	6237921070	Target Card Services
8	63	6193684282	9/17/12	11:16 AM	6237921070	Target Card Services
9	64	6193684282	9/17/12	3:26 PM	9528520005	Target Card Services
10	65	6193684282	9/17/12	6:03 PM	9528520005	Target Card Services
11	66	6193684282	9/18/12	11:55 AM	6237921070	Target Card Services
12	67	6193684282	9/19/12	12:41 PM	6237921070	Target Card Services
13	68	6193684282	9/19/12	5:28 PM	6237921070	Target Card Services
14	69	6193684282	9/20/12	12:27 PM	6123078559	Target Card Services
15	70	6193684282	9/20/12	5:24 PM	6123078559	Target Card Services
16	71	6193684282	9/21/12	12:21 PM	6237921070	Target Card Services
17	72	6193684282	9/24/12	11:28 AM	9528520005	Target Card Services
18	73	6193684282	9/24/12	4:00 PM	9528520005	Target Card Services
19	74	6193684282	9/25/12	12:32 PM	6237921070	Target Card Services
20	75	6193684282	9/27/12	12:02 PM	6123078559	Target Card Services
21	76	6193684282	9/27/12	2:15 PM	6123078559	Target Card Services
22	77	6193684282	9/27/12	4:19 PM	6123078559	Target Card Services
23	78	6193684282	10/1/12	10:56 AM	9528520005	Target Card Services
24	79	6193684282	10/1/12	3:18 PM	9528520005	Target Card Services
25	80	6193684282	10/2/12	12:53 PM	6237921070	Target Card Services
26	81	6193684282	10/4/12	10:55 AM	6123078559	Target Card Services
27	82	6193684282	10/4/12	12:28 PM	6123078559	Target Card Services
28	83	6193684282	10/4/12	2:06 PM	9528520005	Target Card Services
	84	6193684282	10/4/12	4:50 PM	9528520005	Target Card Services
	85	6193684282	10/5/12	11:46 AM	6237921070	Target Card Services
	86	6193684282	10/6/12	11:20 AM	6237921070	Target Card Services
	87	6193684282	10/8/12	12:18 PM	9528520005	Target Card Services
	88	6193684282	10/8/12	4:23 PM	9528520005	Target Card Services
	89	6193684282	10/9/12	11:27 AM	6237921070	Target Card Services
	90	6193684282	10/11/12	12:29 PM	6123078559	Target Card Services
	91	6193684282	10/11/12	6:49 PM	9528520005	Target Card Services
	92	6193684282	10/12/12	12:07 PM	9528520005	Target Card Services
	93	6193684282	10/13/12	12:42 PM	9528520005	Target Card Services
	94	6193684282	10/15/12	11:13 AM	9528520005	Target Card Services
	95	6193684282	10/15/12	12:23 PM	9528520005	Target Card Services
	96	6193684282	10/15/12	5:57 PM	9528520005	Target Card Services
	97	6193684282	10/17/12	12:13 PM	6123078559	Target Card Services
	98	6193684282	10/17/12	4:17 PM	6123078559	Target Card Services
	99	6193684282	10/18/12	5:11PM	9528520005	Target Card Services

COMPLAINT

1	100	6193684282	10/20/12	12:24 PM	9528520005	Target Card Services
2	101	6193684282	10/20/12	1:08 PM	6237921070	Target Card Services
3	102	6193684282	10/22/12	11:39 AM	9528520005	Target Card Services
4	103	6193684282	10/23/12	11:35 AM	9528520005	Target Card Services
5	104	6193684282	10/23/12	1:57 PM	9528520005	Target Card Services
6	105	6193684282	10/24/12	12:32 PM	6123078559	Target Card Services
7	106	6193684282	10/24/12	6:20 PM	6123078559	Target Card Services
8	107	6193684282	10/25/12	11:58 AM	6123078559	Target Card Services
9	108	6193684282	10/25/12	4:00 PM	9528520005	Target Card Services
10	109	6193684282	10/27/12	1:14 PM	6237921070	Target Card Services
11	110	6193684282	10/29/12	11:19 AM	9528520005	Target Card Services
12	111	6193684282	10/29/12	3:22 PM	9528520005	Target Card Services
13	112	6193684282	10/29/12	5:43 PM	9528520005	Target Card Services
14	113	6193684282	10/30/12	12:36 PM	6237921070	Target Card Services
15	114	6193684282	10/30/12	1:49 PM	6237921070	Target Card Services
16	115	6193684282	11/1/12	11:32 AM	6123078559	Target Card Services
17	116	6193684282	11/1/12	3:22 PM	9528520005	Target Card Services
18	117	6193684282	11/1/12	5:35 PM	9528520005	Target Card Services
19	118	6193684282	11/2/12	11:24 AM	9528520005	Target Card Services
20	119	6193684282	11/5/12	12:31 PM	9528520005	Target Card Services
21	120	6193684282	11/6/12	11:55 AM	6237921070	Target Card Services
22	121	6193684282	11/7/12	3:47 PM	6123078559	Target Card Services
23	122	6193684282	11/8/12	11:25 AM	6123078559	Target Card Services
24	123	6193684282	11/8/12	2:42 PM	9528520005	Target Card Services
25	124	6193684282	11/8/12	5:55 PM	9528520005	Target Card Services
26	125	6193684282	11/9/12	11:50 AM	6237921070	Target Card Services
27	126	6193684282	11/10/12	1:14 PM	6237921070	Target Card Services
28	127	6193684282	11/13/12	12:05 PM	6237921070	Target Card Services
	128	6193684282	11/14/12	11:47 AM	6123078559	Target Card Services
	129	6193684282	11/15/12	11:44 AM	6123078559	Target Card Services
	130	6193684282	11/15/12	12:24 PM	6123078559	Target Card Services
	131	6193684282	11/15/12	4:03 PM	9528520005	Target Card Services
	132	6193684282	11/16/12	12:37 PM	6237921070	Target Card Services
	133	6193684282	11/17/12	1:25 PM	6237921070	Target Card Services
	134	6193684282	11/19/12	11:39 AM	9528520005	Target Card Services
	135	6193684282	11/19/12	4:32 PM	9528520005	Target Card Services
	136	6193684282	11/20/12	11:11 AM	9528520005	Target Card Services
	137	6193684282	11/21/12	12:36 PM	6123078559	Target Card Services
	138	6193684282	11/23/12	1:16 PM	6237921070	Target Card Services
	139	6193684282	11/26/12	11:27 AM	9528520005	Target Card Services
	140	6193684282	11/27/12	1:22 PM	6237921070	Target Card Services
	141	6193684282	11/29/12	1:02 PM	6123078559	Target Card Services
	142	6193684282	12/3/12	11:03AM	9528520005	Target Card Services
	143	6193684282	12/4/12	11:00 AM	6237921070	Target Card Services

1	144	6193684282	12/4/12	12:50 PM	6123078559	Target Card Services
2	145	6193684282	12/5/12	11:01 AM	6123078559	Target Card Services
3	146	6193684282	12/5/12	4:27 PM	6123078559	Target Card Services
4	147	6193684282	12/6/12	11:10 AM	6123078559	Target Card Services
5	148	6193684282	12/6/12	2:22 PM	9528520005	Target Card Services
6	149	6193684282	12/7/12	11:28 AM	6237921070	Target Card Services
7	150	6193684282	12/8/12	11:31 AM	6237921070	Target Card Services
8	151	6193684282	12/10/12	12:19 PM	9528520005	Target Card Services
9	152	6193684282	12/10/12	5:00 PM	9528520005	Target Card Services
10	153	6193684282	12/11/12	11:21 AM	6237921070	Target Card Services
11	154	6193684282	12/11/12	12:43 PM	9528520005	Target Card Services
12	155	6193684282	12/12/12	12:11 PM	6123078559	Target Card Services
13	156	6193684282	12/13/12	12:04 PM	6123078559	Target Card Services
14	157	6193684282	12/17/12	11:45 AM	6123078559	Target Card Services
15	158	6193684282	12/17/12	2:36 PM	9528520005	Target Card Services
16	159	6193684282	12/17/12	5:49 PM	9528520005	Target Card Services
17	160	6193684282	12/19/12	1:12 PM	6123078559	Target Card Services
18	161	6193684282	12/20/12	12:52 PM	6123078559	Target Card Services
19	162	6193684282	12/20/12	5:34 PM	9528520005	Target Card Services
20	163	6193684282	12/31/12	10:58 AM	9528520005	Target Card Services
21	164	6193684282	12/31/12	2:10 PM	9528520005	Target Card Services
22	165	6193684282	1/3/13	4:18 PM	6123078559	Target Card Services
23	166	6193684282	1/4/13	11:03 AM	6123078559	Target Card Services
24	167	6193684282	1/5/13	11:25 AM	6123078559	Target Card Services
25	168	6193684282	1/7/13	11:25 AM	6123078559	Target Card Services
26	169	6193684282	1/7/13	5:57 PM	9528520005	Target Card Services
27	170	6193684282	1/8/13	11:01 AM	6237921070	Target Card Services
28	171	6193684282	1/8/13	12:10 PM	6237921070	Target Card Services
	172	6193684282	1/8/13	12:43 PM	6237921070	Target Card Services
	173	6193684282	1/9/13	11:56 AM	6237921070	Target Card Services
	174	6193684282	1/10/13	11:30 AM	6237921070	Target Card Services
	175	6193684282	1/12/13	1:05 PM	6237921070	Target Card Services
	176	6193684282	1/16/13	12:30 PM	6237921070	Target Card Services
	177	6193684282	1/17/13	12:19 PM	6237921070	Target Card Services
	178	6193684282	1/21/13	12:06 PM	6237921070	Target Card Services
	179	6193684282	1/22/13	1:16 PM	6237921070	Target Card Services
	180	6193684282	1/24/13	12:03 PM	6237921070	Target Card Services
	181	6193684282	1/31/13	1:33 PM	6237921070	Target Card Services
	182	6193684282	2/4/13	12:17 PM	6237921070	Target Card Services

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COMPLAINT

1 51. Plaintiff is informed and believes and based thereon alleges that the calls are continuing
2 and that there are additional violations under Civil Code §1788.17 and TCPA, and that
3 discovery will reveal further violations.
4

5 DEFENDANTS Willfully And Knowingly Violated The RFDCPA:
6

7 52. As a “Debt Collector,” Defendants and each of them are fully aware of California’s debt
8 collection laws, including the RFDCPA and the FDCPA to the extent incorporated
9 therein.
10 53. Defendants and each of them are aware that full and complete compliance with the
11 Truth in Lending Act (“TILA”) may take place by communicating with Plaintiff’s
12 attorney, pursuant to the Official Staff Commentary on Regulation Z 226.2(a)(22)-2, as
13 set forth above.
14 54. There is no conflict of law between the RFDCPA and TILA since Defendants can
15 comply with TILA by sending correspondence to Plaintiff’s attorney, instead of
16 Plaintiff.
17 55. Defendants knew each of its harassing communications were willful and knowing
18 violations of Title 1.6C of the California Civil Code §1788 *et seq.* and 15 U.S.C. §1692
19 *et seq.* as incorporated therein.
20 56. Defendants’ harassing communications, as set forth above, were willful and knowing
21 violations of Title 1.6C of the California Civil Code §1788 *et seq.*, and 15 U.S.C. §1692
22 *et seq.* to the extent incorporated therein.
23 57. Defendants’ harassing communications, as set forth above, are part of an overall
24 unlawful business pattern and practice whereby Defendants knowingly, willfully, and
25 intentionally enterprise a profitable unlawful collection scheme to derive profits
26 through the incomplete and inaccurate information and through harassing
27 communications and intentional misinterpretation of TILA laws.
28

1 58. Defendants rarely, if ever, are pursued or sued over such harassing communications, and
2 reporting violations since very few debtors are aware that their rights are being violated,
3 rarely have the financial resources to pursue such claims, and/or very few attorneys are
4 willing to take on such cases.
5
6 59. Defendants are highly motivated to continue their harassing communications since any
7 payments made to resolve any judgments or settlements for such unlawful conduct are
8 minuscule when compared to the overall profits generated from such unlawful conduct.
9

10 DEFENDANTS Willfully And/Or Knowingly Violated

11 The Telephone Consumer Protection Act of 1991

12 60. Plaintiff had a consumer credit card account that had originated with, was assigned to,
13 and/or was serviced by Defendants.
14 61. As a creditor, Defendants and each of them are fully aware of the TCPA and the
15 regulations it provides.
16 62. Plaintiff denies ever providing her cell phone and/or residential telephone number to
17 Defendants with the express consent to be called by an "automatic telephone dialing
18 system" or "artificial or prerecorded voice," or any other method.
19 63. Plaintiff further demonstrated she did not consent to any such calls by mailing one (1)
20 written cease and desist order, as set forth above, instructing Defendants to immediately
21 stop all further communications.
22 64. Defendants knew each of its harassing communications were willful and knowing
23 violations of 47 U.S.C. §227b(1)(A)(iii) and/or 47 U.S.C. §227b(1)(B).
24 65. Defendants' harassing communications, as set forth above, are part of an overall
25 business practice whereby Defendants knowingly, willfully, and intentionally use
26 automated and prerecorded machines to place calls to consumers, which Congress has
27 explicitly found to be a costly nuisance and an invasion of privacy to such individuals.
28

66. Defendants willful and knowing violations of the TCPA undermine Congress' purpose and intent behind the Act. As Defendants are rarely ever sued successfully under the TCPA for such violations, Defendants have the incentive to continue their unlawful practices.

PLAINTIFF Suffered Damages As A Result Of DEFENDANT'S Conduct

67. As a direct result of Defendants' harassing communications, Plaintiff has incurred actual damages consisting of mental and emotional distress, nervousness, grief, embarrassment, loss of sleep, anxiety, worry, mortification, shock, depression, humiliation, indignity, pain and suffering, and other injuries. Plaintiff, in receiving numerous phone calls, felt hopeless and felt there was no way out every time.
68. Plaintiff was diagnosed with multiple sinus infections. Plaintiff has since been prescribed medications to ease the sinus infections which were further exacerbated by the Defendants' incessant phone calls while Plaintiff was attempting to relax.
69. Plaintiff was also experiencing symptoms of panic attacks due to the unrelenting and incessant communications received from Defendants.
70. Plaintiff also suffers from debilitating headaches, migraines and insomnia, all of which have been exacerbated due to the extraordinary amount of stress placed on Plaintiff by the numerous contacts from the Defendants.
71. Plaintiff was forced to seek medical care to alleviate the stress and anxiety and other symptoms Plaintiff was experiencing from the incessant communications received from Defendants.
72. Plaintiff incurred out of pocket monetary damages when attorney fees and costs were paid to the DOAN LAW FIRM, LLP for services provided to protect Plaintiff under the RFDCPA, FDCPA, and TCPA, which ultimately failed.

73. Plaintiff incurred additional incidental actual damages including, but not limited to, gas and transportation costs traveling to the law firm, telephone call charges, postage, and other damages.
74. Plaintiff continues to incur attorney fees and costs in filing this suit and bringing this matter to trial.
75. Defendants' conduct has caused Plaintiff unwarranted and unnecessary time, effort, and expense in seeking to enforce rights guaranteed by California Statute. Plaintiff has incurred mental and emotional distress, nervousness, grief, anxiety, worry, mortification, shock, humiliation and indignity, which will continue to trial.

vii

TEN (10) CAUSES OF ACTION

FIRST CAUSE OF ACTION:

VIOLATION OF CALIFORNIA CIVIL CODE §1788.17

(Under 15 U.S.C. §1692c(a)(2))

76. Plaintiff realleges and incorporates by reference the above paragraphs as though set forth fully herein.

77. California Civil Code §1788.17 of the RFDCPA provides in pertinent part:

Notwithstanding any other provision of this title, every debt collector collecting or attempting to collect a consumer debt shall comply with the provisions of §1692b to 1692j, inclusive, of, and shall be subject to the remedies in §1692k of Title 15 of the United States Code.

78. 15 U.S.C. §1692c(a)(2) as incorporated into §1788.17 the FDCPA provides:
Without the prior consent of the consumer given directly to the debt collector or the express permission of a court of competent jurisdiction, a debt collector may

not communicate with a consumer in connection with the collection of any debt-

(2) if the debt collector knows the consumer is represented by an attorney with respect to such debt and has knowledge of, or can readily ascertain, such attorney's name and address . . .

79. Defendants violated 15 U.S.C. §1692c(a)(2), as incorporated into the RFDCPA since Defendants repeatedly and continuously called and harassed Plaintiff at least at least one hundred eighty-two (182) times, despite the fact that Plaintiff advised Defendants, in writing, to contact DOAN LAW FIRM, LLP regarding the alleged debt.
80. Defendants violated 15 U.S.C. §1692c(a)(2), as incorporated into RFDCPA, because they repeatedly contacted and harassed the Plaintiff after being directly notified, in writing to cease and desist all further communication.
81. California Civil Code §1788.17 requires that Defendants comply with the provisions of 15 U.S.C §1692c(a)(2).
82. The foregoing violations of 15 U.S.C §1692c(a)(2) by Defendants resulted in separate violations of California Civil Code §1788.17.
83. California Civil Code §1788.17 provides that Defendants and each of them are subject to the remedies of 15 U.S.C. §1692k for failing to comply with the provisions of 15 U.S.C. §1692c(a)(2).
84. The foregoing violations by Defendants were willful and knowing violations of Title 1.6C of the California Civil Code (RFDCPA), are sole and separate violations under California Civil Code §1788.30(b), and trigger a penalty of up to \$1,000.00.

111

111

SECOND CAUSE OF ACTION:

VIOLATION OF CALIFORNIA CIVIL CODE §1788.17 OF THE RFDCPA

(Under 15 U.S.C. §1692c(c))

85. Plaintiff realleges and incorporates by reference the above paragraphs as though set forth fully herein.

86. California Civil Code §1788.17 of the RFDCPA provides in pertinent part:

Notwithstanding any other provision of this title, every debt collector collecting or attempting to collect a consumer debt shall comply with the provisions of §1692b to §1692j, inclusive, of, and shall be subject to the remedies in §1692k of Title 15 of the United States Code.

87. 15 U.S.C. §1692c(c) of the FDCPA provides:

If a consumer notifies a debt collector in writing that the consumer refuses to pay a debt or that the consumer wishes the debt collector to cease further communication with the consumer, the debt collector shall not communicate further with the consumer with respect to such debt.

88. DOAN LAW FIRM, LLP sent DEFENDANTS one (1) written "Cease and Desist Order" by mail on February 8, 2013. A true and correct copy of the same and Proof of Service is attached hereto collectively as Exhibit "A" and incorporated herein.

89. Defendants violated 15 U.S.C. §1692c(c) as incorporated into the RFDCPA because Defendants repeatedly and continuously harassed Plaintiff at least one hundred eighty-two (182) times after being directly notified, in writing, of Plaintiff's intent to file bankruptcy,

90. Defendants violated 15 U.S.C §1692c(c), as incorporated into the RFDCPA, because Defendants harassed Plaintiff after being directly notified to cease and desist all further communication.

28 91. California Civil Code §1788.17 requires that Defendants comply with the provisions of

1 15 U.S.C. §1692c(c).

2 92. The foregoing violations of 15 U.S.C. §1692c(c) by Defendants resulted in separate

3 violations of California Civil Code §1788.17.

4 93. California Civil Code Section 1788.17 provides that Defendants and each of them are

5 subject to the remedies of 15 U.S.C. §1692k for failing to comply with the provisions of

6 15 U.S.C. §1692c(c).

7 94. The foregoing violations by Defendants were willful and knowing violations of

8 Title 1.6C of the California Civil Code (RFDCPA), are sole and separate violations under

9 California Civil Code Section §1788.30(b), and trigger a penalty of up to \$1,000.00.

10

11

12 **THIRD CAUSE OF ACTION:**

13 **VIOLATION OF CALIFORNIA CIVIL CODE §1788.17 OF THE RFDCPA**

14 **(Under 15 U.S.C. §1692d(5))**

15 95. Plaintiff realleges and incorporates by reference the above paragraphs as though set forth

16 fully herein.

17 96. California Civil Code §1788.17 of the RFDCPA provides in pertinent part:

18 *Notwithstanding any other provision of this title, every debt collector collecting*
19 or attempting to collect a consumer debt shall comply with the provisions of
20 §1692b to §1692j, inclusive, of, and shall be subject to the remedies in §1692k of
21 Title 15 of the United States Code.

22 97. 15 U.S.C. §1692d(5) of the FDCPA provides:

23 *A debt collector may not engage in any conduct the natural consequence of*
24 which is to harass, oppress, or abuse any person in connection with the
25 collection of a debt. Without limiting the general application of the foregoing,
26 the following conduct is a violation of this section—

27 *(5) Causing a telephone to ring or engaging a person in telephone*

conversation repeatedly or continuously with the intent to annoy, abuse, or harass any person at the called number.

49. Defendants violated 15 U.S.C. §1692d(5), as incorporated into the RFDCPA, because
50. Defendants repeatedly and continuously contacted and harassed Plaintiff by telephone at
51. least one hundred eighty-two (182) regarding the alleged debt.

52. Defendants telephoned Plaintiff on a near-daily basis, including early morning and late at
53. night, and on most days, Defendants placed multiple unlawful telephone calls. By way of
54. example, Defendants called Plaintiff four (4) times on October 4, 2012 at 10:55 am,
55. 12:28 pm, 2:06 pm and 4:50 pm. This number of calls demonstrates the high volume of
56. contacts Defendants placed to Plaintiff.

57. Defendants telephoned Plaintiff at least four (4) calls per day every single day between
58. July 1, 2012 and February 4, 2013. During that seven (7) month span, Defendants
59. called at least one hundred eighty-two (182) times. This high frequency and intensity
60. of calling shows the pattern of contacts Defendants placed to Plaintiff.

61. California Civil Code §1788.17 requires that Defendants comply with the provisions of
62. 15 U.S.C §1692d(5).

63. The foregoing violations of 15 U.S.C §1692d(5) by Defendants resulted in separate
64. violations of California Civil Code Section §1788.17.

65. California Civil Code §1788.17 provides that Defendants and each of them are subject to
66. the remedies of 15 U.S.C. §1692k for failing to comply with the provisions of 15 U.S.C.
67. §1692d(5).

68. The foregoing violations by Defendants were willful and knowing violations of Title 1.6C
69. of the California Civil Code (RFDCPA), are sole and separate violations under California
70. Civil Code Section § 1788.30(b), and trigger a penalty of up to \$1,000.00.

28 | //

FOURTH CAUSE OF ACTION:

VIOLATION OF CALIFORNIA CIVIL CODE §1788.11(d)

105. Plaintiff realleges and incorporates by reference the above paragraphs as though set forth fully herein.
106. California Civil Code Section 1788.11(d) provides in pertinent part:

No debt collector shall collect or attempt to collect a consumer debts by means of the following practices:

(d) Causing a telephone to ring repeatedly or continuously to annoy the person called.
107. Defendants violated California Civil Code §1788.11(d) because they repeatedly and continuously contacted and harassed Plaintiff by telephone at least one hundred eighty-two (182) times regarding the alleged debt.
108. Defendants telephoned Plaintiff on a near-daily basis, including early morning and late at night, and on most days, Defendants placed multiple unlawful telephone calls. By way of example, Defendants called Plaintiff four (4) times on October 4, 2012 at 10:55 am, 12:28 pm, 2:06 pm and 4:50 pm. This number of calls demonstrates the high volume of contacts Defendants placed to Plaintiff.
109. Defendants telephoned Plaintiff at least four (4) calls per day every single day between July 1, 2012 and February 4, 2013. During that seven (7) month span, Defendants called at least one hundred eighty-two (182) times. This high frequency and intensity of calling shows the pattern of contacts Defendants placed to Plaintiff.
110. Plaintiff alleges that the frequent and persistent unlawful telephone contacts from Defendants were made with the intent to induce emotional distress to coerce payment on the alleged debt.
111. The foregoing act(s) by Defendants were willful and knowing violations of Title 1.6C of

1 the California Civil Code (RFDCPA), are sole and separate violations under California
 2 Civil Code Section §1788.30(b), and trigger a **penalty of up to \$1,000.00**.
 3

4 **FIFTH CAUSE OF ACTION:**
 5

6 **VIOLATION OF CALIFORNIA CIVIL CODE §1788.11(e)**

7 112. Plaintiff realleges and incorporates by reference the above paragraphs as though set forth
 8 fully herein.
 9 113. California Civil Code Section 1788.11(e) provides in pertinent part:

10 *No debt collector shall collect or attempt to collect a consumer debts by means
 11 of the following practices:*

12 *(e) Communicating, by telephone or in person, with the debtor with such
 13 frequency as to be unreasonable and to constitute harassment to the debtor
 14 under the circumstances.*

15 114. Defendants violated 15 U.S.C. §1788.11(e) as Defendants repeatedly and continuously
 16 contacted and harassed Plaintiff by telephone and email at least at least one hundred
 17 eighty-two (182) times regarding the alleged debt.
 18 115. Defendants telephoned Plaintiff on a near-daily basis, including early morning and late at
 19 night, and on most days, Defendants placed multiple unlawful telephone calls. By way of
 20 example, Defendants called Plaintiff four (4) times on **October 4, 2012 at 10:55 am,**
 21 **12:28 pm, 2:06 pm and 4:50 pm**. This number of calls demonstrates the high volume of
 22 contacts Defendants placed to Plaintiff.
 23 116. Defendants telephoned Plaintiff at least four (4) calls per day every single day between
 24 July 1, 2012 and February 4, 2013. During that seven (7) month span, Defendants
 25 called at least one hundred eighty-two (182) times. This high frequency and intensity
 26 of calling shows the pattern of contacts Defendants placed to Plaintiff.
 27 117. Plaintiff alleges that the frequent and persistent unlawful telephone contacts are highly
 28

unreasonable and constitute harassment under California Civil Code §1788.11(e).

118. The foregoing act(s) by Defendants were willful and knowing violations of Title 1.6C of the California Civil Code (RFDCPA), are sole and separate violations under California Civil Code Section §1788.30(b), and trigger a penalty of up to \$1,000.00.

SIXTH CAUSE OF ACTION:

VIOLATION OF §1788.14(c) of the RFDCPA

9 119. Plaintiff realleges and incorporates by reference the above paragraphs as though set forth
10 fully herein.
11 120. California Civil Code Section 1788.14(c) provides in pertinent part:

No debt collector shall collect or attempt to collect a consumer debts by means of the following:

(c) *Initiating communications, other than statements of account, with the debtor with regard to the consumer debt, when the debt collector has been previously notified in writing by the debtor's attorney that the debtor is represented by such attorney with respect to the consumer debt and such notice includes the attorney's name and address and a request by such attorney that all communications regarding the consumer debt be addressed to such attorney . . .*

22 121. Defendants violated California Civil Code Section §1788.14(c), because Defendants
23 repeatedly contacted and harassed Plaintiff by calling **at least one hundred eighty-two**
24 **(182)** times after being directly notified in writing [insert: and verbally] of attorney
25 representation concerning the debt.

26 122. The foregoing act(s) by Defendants were willful and knowing violations of Title 1.6C
27 of the California Civil Code (RFDCPA), are sole and separate violations under California
28 Civil Code Section §1788.30(b), and trigger a **penalty of up to \$1,000.00**.

SEVENTH CAUSE OF ACTION:

NEGLIGENCE VIOLATIONS OF THE TELEPHONE CONSUMER PROTECTION

ACT 47 U.S.C. §227 et seq.

123. Plaintiff realleges and incorporates by reference the above paragraphs as though set forth fully herein.
124. Telephone Consumer Protection Act of 1991, 47 U.S.C. §227(b)(1)(A)(iii) and (B) provides in pertinent part:
 - (1) *It shall be unlawful for any person within the United States, or any person outside the United States if the recipient is within the United States -*
 - (A) *to make any call (other than a call made for emergency purpose or made with the prior express consent of the called party) using any automatic telephone dialing system or an artificial or prerecorded voice*
 - (iii) *to any telephone number assigned to a paging service, cellular telephone service, specialized mobile radio service, or other radio common carrier service, or any service for which the called party is charged for the call.*
 - (B) *to initiate any telephone call to any residential telephone line using an artificial or prerecorded voice to deliver a message . . .*
 125. Defendants violated 47 U.S.C. §227 *et seq.* since Defendants called and harassed Plaintiff at least one hundred eighty-two (182) times using an “automated telephone dialing system,” as that term is defined by 47 U.S.C. §227a(1). True and correct copies of the subpoenaed telephone records is attached collectively hereto as Exhibit “B” and is incorporated herein.
 126. During these telephone calls, Defendants used “an artificial or prerecorded voice,” as prohibited by 47 U.S.C. §227b(1)(A) and (B).
 127. Defendants placed these calls to a telephone number assigned to a residential telephone

COMPLAINT
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1 line and/or cellular telephone service for which Plaintiff incurs a charge for incoming
2 calls pursuant to 47 U.S.C. §227b(1)(A) and (B).

3 128. These telephone calls were not placed by Defendants for emergency purposes, within the
4 meaning of 47 U.S.C. §227b(1)(A) and (B).

5 129. Plaintiff did not provide “express consent” allowing Defendants to place telephone calls
6 to Plaintiff’s residential and/or cellular phone placed by an “automatic telephone dialing
7 system” or utilizing an “artificial or prerecorded voice,” within the meaning of 47 U.S.C.
8 §227b(1)(A) and (B).

9 130. In the event Defendants allege they obtained the prior express consent of Plaintiff to
10 receive such automated calls, Plaintiff **expressly and explicitly revoked any such**
11 **consent** in writing when Plaintiff sent **one (1)** “Cease and Desist Order” stating to stop
12 such repetitive and harassing calls. True and correct copies of the Cease and Desist Order
13 and Proof of Service is attached collectively hereto as **Exhibit “A”** and incorporated
14 herein.

15 131. Under the TCPA and pursuant to the FCC’s Declaratory Ruling, the burden is on
16 Defendants to demonstrate Plaintiff provided express consent within the meaning of the
17 statute. Defendants have failed to meet their burden since no written express consent
18 exists. In the alternative, even if Defendants allege such initial consent existed at a prior
19 time, Defendants have failed to meet their burden once the cease and desist letters
20 expressly and explicitly revoked any such consent in writing.

21 132. Defendants’ calls do not fall within any exception by rule or order of the Commission, as
22 provided by 47 U.S.C. §227b(B).

23 133. The foregoing violations of 47 U.S.C. §227b(1) by Defendants trigger a recovery of \$500
24 in statutory damages for each and every call in violation of the statute, pursuant to 47 U.S.C.
25 §227b(3).

EIGHTH CAUSE OF ACTION:

**KNOWING AND/OR WILLFUL VIOLATIONS OF THE TELEPHONE CONSUMER
PROTECTION ACT 47 U.S.C. §227 et seq.**

134. Plaintiff realleges and incorporates by reference the above paragraphs as though set forth fully herein.
135. Telephone Consumer Protection Act of 1991, 47 U.S.C. §227(b)(1)(A)(iii) provides in pertinent part:
 - (1) *It shall be unlawful for any person within the United States, or any person outside the United States if the recipient is within the United States -*
 - (A) *to make any call (other than a call made for emergency purpose or made with the prior express consent of the called party) using any automatic telephone dialing system or an artificial or prerecorded voice*
...
 - (iii) *to any telephone number assigned to a paging service, cellular telephone service, specialized mobile radio service, or other radio common carrier service, or any service for which the called party is charged for the call.*
136. Defendants violated 47 U.S.C. §227b(1)(A) since Defendants knowingly and willingly called and harassed Plaintiff at least one hundred eighty-two (182) times using an “automated telephone dialing system,” as that term is defined by 47 U.S.C. §227a(1). True and correct copies of the subpoenaed telephone records is attached hereto as Exhibit B and is incorporated herein.
137. During these telephone calls, Defendants knowingly and willingly used “an artificial or prerecorded voice,” as prohibited by 47 U.S.C. §227b(1)(A).
138. Defendants knowingly and willingly placed these calls to a residential telephone line and/or cellular telephone service for which Plaintiff incurs a charge for incoming calls.

1 pursuant to 47 U.S.C. §227b(1)(A) and (B).

2 139. These telephone calls were not placed by Defendant for emergency purposes as defined
3 by 47 U.S.C. §227b(1)(A)(I).

4 140. Plaintiff did not provide “express consent” allowing Defendants to place telephone calls
5 to Plaintiff’s residential and/or cellular phone placed by an “automatic telephone dialing
6 system” or utilizing an “artificial or prerecorded voice,” within the meaning of 47 U.S.C.
7 §227b(1)(A) and (B).

8 141. In the event Defendants allege they obtained the prior express consent of Plaintiff to
9 receive such automated calls, Plaintiff **expressly and explicitly revoked any such**
10 **consent** in writing when Plaintiff sent **one (1)** “Cease and Desist Order” stating to stop
11 such repetitive and harassing calls. True and correct copies of the Cease and Desist Order
12 and Proof of Service is attached collectively hereto as **Exhibit “A”** and incorporated
13 herein.

14 142. Under the TCPA and pursuant to the FCC’s Declaratory Ruling, the burden is on
15 Defendants to demonstrate Plaintiff provided express consent within the meaning of the
16 statute. Defendants have failed to meet their burden since no written express consent
17 exists. In the alternative, even if Defendants allege such initial consent existed at a prior
18 time, Defendants have failed to meet their burden once the cease and desist letters
19 expressly and explicitly revoked any such consent in writing.

20 143. Defendants’ calls do not fall within any exception by rule or order of the Commission, as
21 provided by 47 U.S.C. §227b(B).

22 144. The foregoing violations of 47 U.S.C. §227b(1) by Defendants were knowing and/or
23 willful, which entitle Plaintiff to **treble damages of up to \$1,500 for each and every**
24 **call** in violation of the statute, pursuant to 47 U.S.C. §227b(3).

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NINTH CAUSE OF ACTION:

INVASION OF PRIVACY (INTRUSION UPON SECLUSION)

145. Plaintiff realleges and incorporates by reference the above paragraphs as though set forth fully herein.

Defendants Intruded Upon Plaintiffs' Privacy

146. Plaintiff has an objectively reasonable expectation of privacy in the interior of her own home such that Defendants would not continue to communicate and harass Plaintiff and engage in unlawful, intrusive, and abusive telephone calls in an effort to collect a debt after Defendants have documented receipt of **one (1)** Cease and Desist Order from Plaintiff.
147. Defendants intentionally intruded on Plaintiff's privacy by, among other things, continuing to unlawfully and intentionally communicate with Plaintiff at home, after receiving **one (1)** written Cease and Desist Order, and unlawfully and intentionally continued to communicate with Plaintiffs at least **one hundred eighty-two (182)** times, calling for **seven (7) consecutive months**, and repeatedly harassing Plaintiff. even though Defendants knew that Plaintiff was represented by DOAN LAW FIRM, LLP.
148. Plaintiff never consented to Defendants' intrusion and specifically ordered them to stop any and all communications regardless of the form thereof. Nevertheless, Defendants wholly and completely disregarded the notice provided by Plaintiff.

Defendants' Conduct was Highly Offensive

150. Defendants telephoned Plaintiff on a daily basis, including early morning and late at night and on most days there were multiple calls. By way of example, Defendants called the

1 Plaintiff four (4) times on October 4, 2012 at 10:55 am, 12:28 pm, 2:06 pm and
 2 4:50 pm. This calling pattern shows the high volume of calls Defendants placed to
 3 Plaintiff.

4 151. In effect, Plaintiff was under continued surveillance and assaulted by Defendants'
 5 unwavering calls and the constant ringing of the phone.

6 152. Plaintiff is informed and believes, and based thereon alleges, that discovery will reveal
 7 further violations.

8 153. The volume of one hundred eighty-two (182) phone calls in the span of seven (7)
 9 consecutive months demonstrate Defendants' intent to harass the Plaintiff and coerce
 10 Plaintiff into paying money on a debt Defendants knew to be disputed. This pattern and
 11 volume of calling would be considered **highly offensive** to a reasonable person and is an
 12 overly intrusive business practice.

13 154. The FDCPA and RFDCPA, under 15 U.S.C. § 1692d(6) and Cal. Civ. Code § 1788.11(d),
 14 provide that "causing the phone to ring repeatedly or continuously to annoy the
 15 person called" is abusive and harassing to a reasonable person. A reasonable person
 16 would be offended if they were to be called nearly every hour in the pattern
 17 alleged herein. Fausto v. Credigy, 598 F. Supp. 2d 1049, 1056 (W.D. Cal. 2009).

18 155. Defendants called frequently to annoy and harass Plaintiff at her home. There is no reason
 19 for Defendants to call Plaintiff when Defendants could have simply called DOAN LAW
 20 FIRM. Thus, Defendants clearly had a far less intrusive means to collect on this account
 21 and Defendants clearly continued to harass and annoy Plaintiff without any legitimate
 22 justification for this barrage of calls.

23 156. Defendants' cavalier conduct demonstrated complete disregard for Plaintiff's autonomy,
 24 dignity, and serenity in her home. Defendants' conduct has caused Plaintiff unwarranted
 25 and unnecessary time, effort, and expense in seeking to enforce rights guaranteed by the
 26 California Statute. Plaintiff has incurred mental and emotional distress, nervousness, grief,
 27

anxiety, worry, mortification, shock, humiliation and indignity, which will continue to trial.

157. Courts have held that repeated and continuous calls in an attempt to collect a debt give rise to a claim for intrusion upon seclusion. Fausto v. Credigy, 598 F. Supp. 2d 1049, 1056 (N.D. CA 2009) (citing to Panahiasl v. Gurney, 2007 U.S. Dist. Lexis 17269 and Joseph v. JJ. MacIntryre LLC, 238 F. Supp. 2d 1158, 1169 (N.D. Cal. 2002)).
158. These intrusions as against Plaintiff by Defendants in incessantly and repeatedly making multiple telephone calls to Plaintiff were intense and occurred in a way that would be highly offensive to a reasonable person in Plaintiff's position.
159. Defendants' conduct was particularly offensive since Plaintiff suffers sinus infections and panic attacks due to Defendants' harassing phone calls.
160. Defendants continuously called Plaintiff's cell phone. **There was no escape from Defendants repeated calls.** Each call from Defendants invaded Plaintiff's physical and sensory privacy each time the phone rang. Plaintiff, and any reasonable person, would find that the calling pattern of the Defendants was highly annoying and offensive.
161. Defendants' intrusions against Plaintiff occurred after Defendants knew Plaintiff was represented by DOAN LAW FIRM, LLP and fact that said attorneys would sue Defendants for such mean-spirited conduct if it continued, shows the audacity and scorched Earth tactics that Defendants would employ at a "stop for nothing" attitude.
162. As a result of such invasions of privacy, Plaintiff is entitled to actual damages in amount to be determined according to proof.
163. Defendants also acted with such oppression, fraud, and/or malice, that Plaintiff is also entitled to punitive damages in an amount according to proof.

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TENTH CAUSE OF ACTION:

INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS

164. Plaintiff realleges and incorporates by reference the above paragraphs as though set forth fully herein.
165. Defendants' conduct was outrageous and extreme as evidenced by these facts:
 - (a) Defendants contacted Plaintiff **at least one hundred eighty-two (182) times**;
 - (b) Defendants called multiple times a day, sometimes making **at least four (4) calls** in a single day; and
 - (c) Defendants called the Plaintiff **four (4) times on October 4, 2012 at 10:55 am, 12:28 pm, 2:06 pm and 4:50 pm**. This calling pattern shows the high volume of calls Defendants placed to Plaintiff.
166. Defendants' conduct was intentional, as evidenced by, among other things, continuing to communicate with Plaintiff at home after receiving **one (1) written Cease and Desist Order** attached as **Exhibit "A"** hereto. Defendants unlawfully and intentionally communicated with Plaintiff at least **one hundred eighty-two (182) times** even though Defendants knew that Plaintiff was represented by DOAN LAW FIRM, LLP.
167. These actions are in direct violation of the FDCPA and RFDCPA. All of these actions by Defendants clearly demonstrated reckless disregard for Plaintiff and her emotional well being.
168. Plaintiff suffers from sinus infections and panic attacks as a result of Defendants' actions.
169. Defendants' outrageous actions against Plaintiff occurred after Defendants knew Plaintiff was represented by DOAN LAW FIRM, LLP and in fact that said attorneys would sue Defendants for such conduct if it continued, shows the audacity and scorched Earth tactics that Defendants would employ at a "stop for nothing" attitude.
170. As a result of such intentional infliction of emotional distress, Plaintiff is entitled to actual damages in amount to be determined according to proof.

171. Defendants also acted with such oppression, fraud, and/or malice, that Plaintiff is also entitled to punitive damages in an amount according to proof.

VIII.

PRAYERS FOR RELIEF

WHEREFORE, Plaintiff having set forth the claims for relief against Defendants, respectfully prays this Court grant relief in excess of \$25,000.00 monetary damages including **Actual Damages, Statutory Penalties, Punitive Damages, Attorney Fees and Costs** according to proof, **Injunctive Relief**, and **Declaratory Relief**. Such relief is reasonably justified under the circumstances, and is more specifically broken down as follows:

A. **Actual Economic Damages** totaling at least \$1,742.33, consisting of \$727.33 attorney fees previously paid to DOAN LAW FIRM, LLP to end the harassment, and \$15.00 in transportation, gasoline, telephone call charges, and postage, pursuant to California Civil Code §1788.30(a); \$1,000.00 Additional Damages pursuant to California Civil Code §1788.17 incorporating 15 U.S.C. §1692k; and other economic damages accruing prior to the Order for Bankruptcy Relief,

B. **Actual Non-Economic Damages** in excess of \$11,120 pursuant to California Civil Code §1788.30(a) for mental and emotional distress, anxiety, fear, embarrassment, distractions at place of work, and other injuries. Including, expenses for Plaintiff having to seek services of a therapist and psychologist.

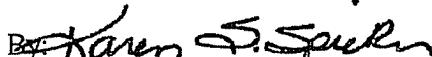
- a.) **Statutory Penalties of at least \$1,000.00** against Defendants arising from violations of Civil Code §1788.17 (under 15 U.S.C. §1692c(a)(2));
- b.) **Statutory Penalties of at least \$1,000.00** against Defendants arising from violations of Civil Code §1788.17 (under 15 U.S.C. §1692c(c));
- c.) **Statutory Penalties of at least \$1,000.00** against Defendants arising from violations of Civil Code §1788.17 (under 15 U.S.C. §1692d(5));

- d.) **Statutory Penalties of at least \$1,000.00** against Defendants arising from violations of Civil Code §1788.11(d);
- e.) **Statutory Penalties of at least \$1,000.00** against Defendants arising from violations of Civil Code §1788.11(e);
- f.) **Statutory Penalties of at least \$1,000.00** against Defendants arising from violations of Civil Code §1788.14(c);
- g.) **Statutory Penalties of at least \$1,500.00** as against Defendants arising for each and every violation of 47 U.S.C. §227(b)(1) pursuant to 47 U.S.C. §227(b)(3)(B);
- h.) **Alternatively**, if the Court finds Plaintiff is not entitled to statutory penalties of \$1,500.00 for each violation of 47 U.S.C. §227(b)(1), Plaintiff requests **Statutory Penalties of up to \$500.00** as against Defendants arising for each and every violation of 47 U.S.C. §227(b)(1) pursuant to 47 U.S.C. §227(b)(3)(C), and as further proof may reveal;
- i.) **Punitive damages of at least \$10,000** based on Defendants' Insert Invasion of Privacy and Intentional Infliction of Emotional Distress;
- j.) **Costs of Litigation** and reasonable **Attorney's Fees** against Defendants pursuant to California Civil Code §§1788.14, 1788.17, and Cal. Code Civ. Proc. §1021.5.
- k.) **Injunctive Relief** against Defendants, restraining them from any further contact with Plaintiff and from reporting incomplete and inaccurate information to credit reporting agencies;
- l.) **Declaratory Relief** against Defendants, declaring their practices of communicating with and harassing Plaintiff was in violation of California Civil Code Section §§1788.14, and 1788.17; and
- m.) Such **other and further relief** as the Court may deem just and proper.

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1 Dated: July 29, 2013
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3 Respectfully submitted,
4 DOAN LAW FIRM, LLP
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8 Karen S. Spicker, Esq.
9 Attorney for Plaintiff
10 ELENA REESE
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EXHIBIT A

DOAN LAW FIRM, LLP
2850 Pio Pico Drive, Suite D
Carlsbad, California 92008
Phone (760) 450-3333 • Fax (760) 720-6082
www.DoanLaw.com

February 7, 2013

**CEASE AND DESIST ORDER PER CC 1788.17 WITH
BILLING ERROR NOTICE AND ADDRESS CHANGE PER FCBA**

Tnb - Target
Po Box 673
Minneapolis, MN 55440

Re: Debtor(s): Elena Reese
Soc Sec No: XXX-XX-2548
Account No: x3531 and any other accounts related to the Debtor(s)
Amount: \$1,701.00

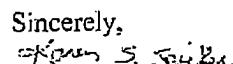
To Whom It May Concern:

Please note the above referenced debtor(s) have retained Doan Law Firm to end Creditor Communications and to discharge your claim(s) with Title 11 relief. Accordingly, whether you are a collection agent or the original creditor, California Civil Code Section 1788.17 via 15 U.S.C. 1692 requires you cease and desist any and all future communications on any and all accounts associated with the above referenced debtor(s). Such notice to cease and desist must be given and transferred from creditor to any debt collector, or any other party that is creditor's successors-in-interest, agents, or any other third party, and such subsequent parties shall thereby be deemed to have received such notice. This letter revokes all prior business relationships as defined by The Telephone Consumer Protection Act 47 U.S.C. 227 (a)(2) by and between any of the original parties involved in this matter, as well as any subsequent parties in interest. Any prior consent that may have been given that would allow for the calling my clients is expressly revoked. Therefore, any future phone calls to the above debtor(s) using an automated telephone dialing system will result in violation of The Telephone Consumer Protection Act 47 U.S.C. 227 (b)(1)(A). Please also take all measures to check and comply with the National Do Not Call Registry, and do not call my client in violation thereof. Further, you are specifically prohibited from calling my clients at any time, including, but not limited to at a work number or during work hours, as their employer prohibits such calls. Likewise, any prior agreement to arbitrate or mediate, this or any related matter, by and between my client and any party is hereby revoked.

Additionally, the debtor(s) dispute the total debt and refuse to pay the total debt, in light of basic contract enforceability issues. Please provide our Firm copies of any contract you believe support your claim(s) in a court of law. Unless our Firm sends you written confirmation that you possess an enforceable contract, you must report the entire amount as "disputed" to all you report to per 15 USC 1692(e)8, CC 1788.17, CC 1782.25(a), and 15 USC 1601. This would also include identifying this account as "disputed" in any and all credit bureau reporting you do, such as entering compliance condition code "XB" in base segment field 20 when uploading Metro 2 automated data reporting.

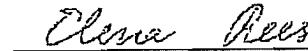
Pursuant to FCBA and TILA, demand is hereby made that the address for any future billing statements be changed to our office at 2850 Pio Pico Drive, Suite D, Carlsbad, CA 92008, per the Official Staff Commentary on Regulation Z 226.2(a)(22)-2. Please see In re Wright (1981) 11 BR 590, 592, for further explanation.

Since you have now been officially noticed as required by law, any future communications directly with our client(s), without our express written consent, shall result in a lawsuit being filed against you for knowing and willful creditor abuse violations and subject you to actual damages, statutory penalties, attorney fees, and costs. You will soon receive a Federal Notice governing your claim. You may verify the above debtor(s) attorney representation by (1) calling our office at (760) 450-3333 or (2) you may access our "Creditor Link" anytime at http://doanlaw.com/creditor_link.html. Please note, however, Karen S. Spicker represents the undersigned limited to this Cease and Desist Notice.

Sincerely,

Karen Spicker,
Attorney at Law

**DEBTOR CEASE AND DESIST NOTICE PER CC 1788.17
AND BILLING ERROR NOTICE/ADDRESS CHANGE PER 15 USC 1666(b)6:**

The undersigned affirms the foregoing, and disputes your claim(s), refuses to pay, and requests a change of address with all future correspondence to be sent to: 2850 Pio Pico Drive, Suite D, Carlsbad, CA 92008.
DO NOT COMMUNICATE WITH ME DIRECTLY ANYMORE.


Elena Reese

PROOF OF SERVICE
(Reese, Elena)

I, the undersigned, declare that I am over the age of 18 and not a party to this action. I am employed in the City of Carlsbad, California; my business address is Doan Law Firm, LLP, 2850 Pio Pico Drive, Suite D, Carlsbad, California 92008.

On the date below I served a copy of the following document(s):

Cease and Desist Order on all interested parties in said case addressed as follows:

Tab - Target
PO Box 673
Minneapolis, MN 55440

X (BY MAIL): By placing envelope for collection and mailing following our ordinary business practices. I am readily familiar with the firm's practice of collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course

(BY HAND) By placing the document in an envelope or package addressed to the persons listed above and providing them to a professional messenger service for delivery.

(BY FEDERAL EXPRESS) By depositing copies of the above documents in a box or other facility regularly maintained by Federal Express with delivery fees paid or provided for.

(BY FAX) By use of facsimile machine telephone number (760) 720-6082, I faxed a true copy to the addressee(s) listed above at the facsimile number(s) noted after the party's address. The transmission was reported as complete and without error. The attached transmission report, which sets forth the date and time for the transmission, was properly issued by the transmitting facsimile machine.

(BY ELECTRONIC TRANSMISSION) By sending a file of the above document(s) via electronic transmission (e-mail) at _____ a.m./p.m. using e-mail address _____ to the e-mail address designated for each party identified above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. This declaration is executed in Carlsbad, California, on February 8, 2013.

Derrick Yong

EXHIBIT B

Network Element Name	Mobile Directory Number	Dialed Digit Number	Direction	Seizure Dt Tm	Duration	Calling Party Number
Vista_mtx2	6193684282	6193684282 F		1/3/2013 16:18	32	6123078559
LosAngelesGateway	6193684282	1.09E+13	5	1/3/2013 16:19	3	6123078559
Azusa53	6193684282	1.09E+13	5	1/3/2013 16:19	3	6123078559
Vista_mtx2	6193684282	6193684282 F		1/4/2013 11:03	31	6123078559
Vista	6193684282	7606914355	0	1/4/2013 11:03	26	6123078559
Vista_mtx2	6193684282	6193684282 F		1/5/2013 11:25	25	6123078559
LosAngelesGateway	6193684282	1.09E+13	5	1/5/2013 11:25	3	6123078559
Azusa53	6193684282	1.09E+13	5	1/5/2013 11:25	3	6123078559
Vista_mtx2	6193684282	6193684282 F		1/7/2013 11:25	31	6123078559
Vista	6193684282	7606914083	0	1/7/2013 11:25	27	6123078559
Vista_mtx2	6193684282	6193684282 F		1/7/2013 17:57	29	9528520005
Vista	6193684282	7606914428	0	1/7/2013 17:57	26	9528520005
Vista_mtx2	6193684282	6193684282 F		1/8/2013 11:01	32	6237921070
Vista	6193684282	7606914570	0	1/8/2013 11:01	28	6237921070
Vista_mtx2	6193684282	6193684282 F		1/8/2013 12:10	33	6237921070
Vista	6193684282	7606914172	0	1/8/2013 12:10	30	6237921070
Vista_mtx2	6193684282	6193684282 F		1/8/2013 12:43	30	6237921070
Vista	6193684282	7606914560	0	1/8/2013 12:43	27	6237921070
Vista_mtx2	6193684282	6193684282 F		1/9/2013 11:56	17	6237921070
Vista	6193684282	7606914846	0	1/9/2013 11:56	13	6237921070
Vista_mtx2	6193684282	6193684282 F		1/10/2013 11:30	30	6237921070
Vista	6193684282	7606914734	0	1/10/2013 11:30	26	6237921070
Vista_mtx2	6193684282	6193684282 F		1/12/2013 13:05	33	6237921070
LosAngelesGateway	6193684282	1.09E+13	5	1/12/2013 13:05	3	6237921070
Azusa53	6193684282	1.09E+13	5	1/12/2013 13:05	3	6237921070
Vista_mtx2	6193684282	6193684282 F		1/16/2013 12:30	28	6237921070
Vista	6193684282	7606914852	0	1/16/2013 12:30	24	6237921070
Vista_mtx2	6193684282	6193684282 F		1/17/2013 12:19	38	6237921070
Vista	6193684282	7606914246	0	1/17/2013 12:19	35	6237921070
Vista_mtx2	6193684282	6193684282 F		1/21/2013 12:06	41	6237921070
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	1/21/2013 12:07	3	6237921070
Azusa53	6193684282	1.09E+13	5	1/21/2013 12:07	3	6237921070
Vista_mtx2	6193684282	6193684282 F		1/22/2013 13:16	32	6237921070
LosAngelesGateway	6193684282	1.09E+13	5	1/22/2013 13:16	3	6237921070
Azusa53	6193684282	1.09E+13	5	1/22/2013 13:16	3	6237921070
Vista_mtx2	6193684282	6193684282 F		1/24/2013 12:03	13	6237921070

Vista	6193684282	7606914405	0	1/24/2013 12:03	10	6237921070
Vista_MTX2	6193684282	6193684282 F		1/31/2013 13:33	32	6237921070
LosAngelesGateway	6193684282	1.09E+13	5	1/31/2013 13:33	3	6237921070
Vista_MTX2	6193684282	6193684282 F		2/4/2013 12:17	31	6237921070
Vista	6193684282	7606914885	0	2/4/2013 12:17	28	6237921070
SanDiego_48	6193684282	6193684282 F		4/9/2012 13:10	19	6123075885
Vista	6193684282	7606914885	0	4/9/2012 13:10	15	6123075885
Azusa55	6193684282	1.09E+13	5	4/9/2012 13:10	3	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	4/9/2012 13:10	3	6123075885
SanDiego_48	6193684282	6193684282 F		4/9/2012 16:43	12	6123075885
Azusa55	6193684282	1.09E+13	5	4/9/2012 16:43	4	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	4/9/2012 16:43	4	6123075885
SanDiego_48	6193684282	6193684282 F		4/9/2012 18:53	31	6123075885
Azusa55	6193684282	1.09E+13	5	4/9/2012 18:54	3	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	4/9/2012 18:54	3	6123075885
SanDiego_48	6193684282	6193684282 F		4/21/2012 8:59	21	9528520003
Azusa55	6193684282	1.09E+13	5	4/21/2012 8:59	3	9528520003
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	4/21/2012 8:59	3	9528520003
SanDiego_48	6193684282	6193684282 F		4/21/2012 10:29	31	6123075885
Azusa55	6193684282	1.09E+13	5	4/21/2012 10:29	2	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	4/21/2012 10:29	2	6123075885
SanDiego_48	6193684282	6193684282 F		4/21/2012 12:30	15	6123075885
Azusa55	6193684282	1.09E+13	5	4/21/2012 12:30	4	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	4/21/2012 12:30	4	6123075885
Azusa55	6193684282	1.09E+13	5	4/24/2012 10:55	4	9528520003
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	4/24/2012 10:55	4	9528520003
SanDiego_48	6193684282	6193684282 F		4/24/2012 10:55	4	9528520003
SanDiego_48	6193684282	6193684282 F		4/24/2012 16:19	32	9528520003
Azusa55	6193684282	1.09E+13	5	4/24/2012 16:20	3	9528520003
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	4/24/2012 16:20	3	9528520003
SanDiego_48	6193684282	6193684282 F		4/28/2012 8:13	30	6123075885
Azusa55	6193684282	1.09E+13	5	4/28/2012 8:14	2	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	4/28/2012 8:14	2	6123075885
Azusa55	6193684282	1.09E+13	5	4/28/2012 10:56	4	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	4/28/2012 10:56	4	6123075885
SanDiego_48	6193684282	6193684282 F		4/28/2012 10:56	4	6123075885
SanDiego_48	6193684282	6193684282 F		4/28/2012 13:11	23	6123075885

Vista	6193684282	7606914157	0	4/28/2012 13:11	20	6123075885
Azusa55	6193684282	1.09E+13	5	4/28/2012 13:12	3	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	4/28/2012 13:12	3	6123075885
SanDiego_48	6193684282	6193684282 F		4/30/2012 11:58	30	9528520003
Vista	6193684282	7606914333	0	4/30/2012 11:58	27	9528520003
Azusa55	6193684282	1.09E+13	5	4/30/2012 11:58	3	9528520003
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	4/30/2012 11:58	3	9528520003
SanDiego_48	6193684282	6193684282 F		4/30/2012 16:57	15	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	4/30/2012 16:58	4	9528520003
Azusa55	6193684282	1.09E+13	5	4/30/2012 16:58	3	9528520003
SanDiego_48	6193684282	6193684282 F		5/1/2012 11:34	33	9528520003
Vista	6193684282	7606914646	0	5/1/2012 11:34	30	9528520003
Azusa55	6193684282	1.09E+13	5	5/1/2012 11:34	2	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	5/1/2012 11:34	2	9528520003
SanDiego_48	6193684282	6193684282 F		5/1/2012 13:49	21	9528520003
Vista	6193684282	7606914077	0	5/1/2012 13:49	17	9528520003
Azusa55	6193684282	1.09E+13	5	5/1/2012 13:49	3	9528520003
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	5/1/2012 13:49	3	9528520003
SanDiego_48	6193684282	6193684282 F		5/1/2012 16:26	29	9528520003
Vista	6193684282	7606914337	0	5/1/2012 16:26	25	9528520003
Azusa55	6193684282	1.09E+13	5	5/1/2012 16:26	3	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	5/1/2012 16:26	3	9528520003
SanDiego_48	6193684282	6193684282 F		5/2/2012 11:18	13	9528520003
Vista	6193684282	7606914889	0	5/2/2012 11:18	10	9528520003
Azusa55	6193684282	1.09E+13	5	5/2/2012 11:18	3	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	5/2/2012 11:18	3	9528520003
SanDiego_48	6193684282	6193684282 F		5/2/2012 16:25	16	9528520003
Azusa55	6193684282	1.09E+13	5	5/2/2012 16:26	3	9528520003
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	5/2/2012 16:26	3	9528520003
SanDiego_48	6193684282	6193684282 F		5/2/2012 18:33	30	9528520003
Vista	6193684282	7606914499	0	5/2/2012 18:33	27	9528520003
Azusa55	6193684282	1.09E+13	5	5/2/2012 18:33	3	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	5/2/2012 18:33	3	9528520003
SanDiego_48	6193684282	6193684282 F		5/3/2012 11:12	16	9528520003
Vista	6193684282	7606914276	0	5/3/2012 11:12	9	9528520003
Azusa55	6193684282	1.09E+13	5	5/3/2012 11:12	7	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	5/3/2012 11:12	7	9528520003

Azusa55	6193684282	1.09E+13	5	5/3/2012 12:53	3	9528520003
SanDiego_48	6193684282	6193684282 F		5/3/2012 12:53	3	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	5/3/2012 12:53	3	9528520003
SanDiego_48	6193684282	6193684282 F		5/3/2012 16:06	29	9528520003
Azusa55	6193684282	1.09E+13	5	5/3/2012 16:06	2	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	5/3/2012 16:06	2	9528520003
SanDiego_48	6193684282	6193684282 F		5/3/2012 16:51	29	9528520003
Azusa55	6193684282	1.09E+13	5	5/3/2012 16:51	2	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	5/3/2012 16:51	2	9528520003
SanDiego_48	6193684282	6193684282 F		5/4/2012 11:19	22	9528520003
Vista	6193684282	7606914670	0	5/4/2012 11:19	19	9528520003
A 55	6193684282	1.09E+13	5	5/4/2012 11:19	3	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	5/4/2012 11:19	2	9528520003
SanDiego_48	6193684282	6193684282 F		5/4/2012 12:59	32	9528520003
Vista	6193684282	7606914077	0	5/4/2012 12:59	30	9528520003
Azusa55	6193684282	1.09E+13	5	5/4/2012 12:59	2	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	5/4/2012 12:59	2	9528520003
SanDiego_48	6193684282	6193684282 F		5/4/2012 14:23	30	9528520003
Vista	6193684282	7606914425	0	5/4/2012 14:23	27	9528520003
Azusa55	6193684282	1.09E+13	5	5/4/2012 14:24	3	9528520003
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	5/4/2012 14:24	3	9528520003
SanDiego_48	6193684282	6193684282 F		5/5/2012 9:23	31	6123075885
Vista	6193684282	7606914081	0	5/5/2012 9:23	27	6123075885
Azusa55	6193684282	1.09E+13	5	5/5/2012 9:23	4	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	5/5/2012 9:23	4	6123075885
SanDiego_48	6193684282	6193684282 F		5/5/2012 11:13	13	6123075885
Vista	6193684282	7606914541	0	5/5/2012 11:13	10	6123075885
Azusa55	6193684282	1.09E+13	5	5/5/2012 11:13	3	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	5/5/2012 11:13	3	6123075885
SanDiego_48	6193684282	6193684282 F		5/5/2012 12:39	13	6123075885
Vista	6193684282	7606914128	0	5/5/2012 12:39	7	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	5/5/2012 12:40	6	6123075885
Azusa55	6193684282	1.09E+13	5	5/5/2012 12:40	5	6123075885
SanDiego_48	6193684282	6193684282 F		5/6/2012 10:29	33	6123075885
Vista	6193684282	7606914164	0	5/6/2012 10:29	28	6123075885
Azusa55	6193684282	1.09E+13	5	5/6/2012 10:29	5	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	5/6/2012 10:29	5	6123075885

SanDiego_48	6193684282	6193684282 F	5/6/2012 12:49	4	9528520003
Azusa55	6193684282	1.09E+13	5	5/6/2012 12:49	3
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	5/6/2012 12:49	3
SanDiego_48	6193684282	6193684282 F	5/6/2012 17:34	16	9528520003
Azusa55	6193684282	1.09E+13	5	5/6/2012 17:35	5
LosAngelesGateway	6193684282	1.09E+13	5	5/6/2012 17:35	5
SanDiego_48	6193684282	6193684282 F	5/7/2012 11:49	11	9528520003
Vista	6193684282	7606914852	0	5/7/2012 11:49	8
Azusa55	6193684282	1.09E+13	5	5/7/2012 11:50	3
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	5/7/2012 11:50	3
SanDiego_48	6193684282	6193684282 F	5/7/2012 18:07	30	9528520003
Azusa55	6193684282	1.09E+13	5	5/7/2012 18:07	2
LosAngelesGateway	6193684282	1.09E+13	5	5/7/2012 18:07	2
SanDiego_48	6193684282	6193684282 F	5/8/2012 11:58	27	9528520003
Azusa55	6193684282	1.09E+13	5	5/8/2012 11:58	3
LosAngelesGateway	6193684282	1.09E+13	5	5/8/2012 11:58	3
SanDiego_48	6193684282	6193684282 F	5/9/2012 12:33	31	9528520003
Vista	6193684282	7606914663	0	5/9/2012 12:33	28
Azusa55	6193684282	1.09E+13	5	5/9/2012 12:33	2
LosAngelesGateway	6193684282	1.09E+13	5	5/9/2012 12:33	2
SanDiego_48	6193684282	6193684282 F	5/9/2012 16:42	28	9528520003
Azusa55	6193684282	1.09E+13	5	5/9/2012 16:42	2
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	5/9/2012 16:42	2
SanDiego_48	6193684282	6193684282 F	5/10/2012 12:44	32	9528520003
Azusa55	6193684282	1.09E+13	5	5/10/2012 12:45	3
LosAngelesGateway	6193684282	1.09E+13	5	5/10/2012 12:45	3
SanDiego_48	6193684282	6193684282 F	5/10/2012 16:49	12	9528520003
Azusa55	6193684282	1.09E+13	5	5/10/2012 16:49	3
LosAngelesGateway	6193684282	1.09E+13	5	5/10/2012 16:49	3
SanDiego_48	6193684282	6193684282 F	5/11/2012 12:07	11	9528520003
Azusa55	6193684282	1.09E+13	5	5/11/2012 12:07	3
LosAngelesGateway	6193684282	1.09E+13	5	5/11/2012 12:07	3
SanDiego_48	6193684282	6193684282 F	5/12/2012 9:21	32	6123075885
Vista	6193684282	7606914801	0	5/12/2012 9:21	28
Azusa55	6193684282	1.09E+13	5	5/12/2012 9:22	3
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	5/12/2012 9:22	3
SanDiego_48	6193684282	6193684282 F	5/12/2012 11:50	32	6123075885

Vista	6193684282	7606914669	0	5/12/2012 11:50	30	6123075885
Azusa55	6193684282	1.09E+13	5	5/12/2012 11:50	2	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	5/12/2012 11:50	2	6123075885
SanDiego_48	6193684282	6193684282 F		5/12/2012 13:24	20	6123075885
Vista	6193684282	7606914276	0	5/12/2012 13:24	16	6123075885
Azusa55	6193684282	1.09E+13	5	5/12/2012 13:24	4	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	5/12/2012 13:24	4	6123075885
SanDiego_48	6193684282	6193684282 F		5/13/2012 9:41	30	6123075885
Vista	6193684282	7606914364	0	5/13/2012 9:41	27	6123075885
Azusa55	6193684282	1.09E+13	5	5/13/2012 9:41	3	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	5/13/2012 9:41	3	6123075885
SanDiego_48	6193684282	6193684282 F		5/13/2012 12:21	29	9528520003
Azusa55	6193684282	1.09E+13	5	5/13/2012 12:21	3	9528520003
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	5/13/2012 12:21	3	9528520003
SanDiego_48	6193684282	6193684282 F		5/13/2012 15:58	31	9528520003
Azusa55	6193684282	1.09E+13	5	5/13/2012 15:59	2	9528520003
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	5/13/2012 15:59	2	9528520003
SanDiego_48	6193684282	6193684282 F		5/15/2012 12:53	32	9528520003
Vista	6193684282	7606914658	0	5/15/2012 12:53	30	9528520003
Azusa55	6193684282	1.09E+13	5	5/15/2012 12:53	2	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	5/15/2012 12:53	2	9528520003
SanDiego_48	6193684282	6193684282 F		5/15/2012 15:20	33	9528520003
Vista	6193684282	7606914030	0	5/15/2012 15:20	30	9528520003
Azusa55	6193684282	1.09E+13	5	5/15/2012 15:20	3	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	5/15/2012 15:20	3	9528520003
SanDiego_48	6193684282	6193684282 F		5/16/2012 11:46	26	9528520003
Vista	6193684282	7606914494	0	5/16/2012 11:46	23	9528520003
Azusa55	6193684282	1.09E+13	5	5/16/2012 11:46	2	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	5/16/2012 11:46	2	9528520003
SanDiego_48	6193684282	6193684282 F		5/16/2012 17:14	22	9528520003
Azusa55	6193684282	1.09E+13	5	5/16/2012 17:14	2	9528520003
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	5/16/2012 17:14	2	9528520003
SanDiego_48	6193684282	6193684282 F		5/17/2012 13:12	33	9528520003
Vista	6193684282	7606914078	0	5/17/2012 13:12	30	9528520003
Azusa55	6193684282	1.09E+13	5	5/17/2012 13:13	3	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	5/17/2012 13:13	3	9528520003
SanDiego_48	6193684282	6193684282 F		5/18/2012 13:31	15	9528520003

Vista	6193684282	7606914870	0	5/18/2012 13:31	11	9528520003
Azusa55	6193684282	1.09E+13	5	5/18/2012 13:31	3	9528520003
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	5/18/2012 13:31	4	9528520003
SanDiego_48	6193684282	6193684282 F		5/19/2012 9:02	14	6123075885
Vista	6193684282	7606914870	0	5/19/2012 9:02	9	6123075885
Azusa55	6193684282	1.09E+13	5	5/19/2012 9:02	4	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	5/19/2012 9:02	4	6123075885
SanDiego_48	6193684282	6193684282 F		5/19/2012 11:54	29	6123075885
Vista	6193684282	7606914692	0	5/19/2012 11:54	26	6123075885
Azusa55	6193684282	1.09E+13	5	5/19/2012 11:54	3	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	5/19/2012 11:54	3	6123075885
SanDiego_48	6193684282	6193684282 F		5/20/2012 10:28	10	6123075885
Vista	6193684282	7606914229	0	5/20/2012 10:28	7	6123075885
Azusa55	6193684282	1.09E+13	5	5/20/2012 10:28	4	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	5/20/2012 10:28	4	6123075885
Azusa55	6193684282	1.09E+13	5	5/20/2012 13:29	3	9528520003
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	5/20/2012 13:29	3	9528520003
SanDiego_48	6193684282	6193684282 F		5/20/2012 13:29	3	9528520003
SanDiego_48	6193684282	6193684282 F		5/20/2012 17:36	18	9528520003
Vista	6193684282	7606914742	0	5/20/2012 17:36	15	9528520003
Azusa55	6193684282	1.09E+13	5	5/20/2012 17:37	3	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	5/20/2012 17:37	3	9528520003
SanDiego_48	6193684282	6193684282 F		5/21/2012 17:26	11	9528520003
Azusa55	6193684282	1.09E+13	5	5/21/2012 17:26	3	9528520003
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	5/21/2012 17:26	3	9528520003
SanDiego_48	6193684282	6193684282 F		5/22/2012 12:28	29	9528520003
Azusa55	6193684282	1.09E+13	5	5/22/2012 12:29	2	9528520003
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	5/22/2012 12:29	2	9528520003
SanDiego_48	6193684282	6193684282 F		5/22/2012 15:48	30	9528520003
Azusa55	6193684282	1.09E+13	5	5/22/2012 15:48	3	9528520003
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	5/22/2012 15:48	3	9528520003
SanDiego_48	6193684282	6193684282 F		5/26/2012 8:35	30	6123075885
Vista	6193684282	7606914820	0	5/26/2012 8:35	27	6123075885
Azusa55	6193684282	1.09E+13	5	5/26/2012 8:35	2	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	5/26/2012 8:35	2	6123075885
SanDiego_48	6193684282	6193684282 F		5/26/2012 11:18	24	6123075885
Vista	6193684282	7606914440	0	5/26/2012 11:18	22	6123075885

Azusa55	6193684282	1.09E+13	5	5/26/2012 11:19	2	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	5/26/2012 11:19	2	6123075885
SanDiego_48	6193684282	6193684282 F		5/26/2012 13:20	31	6123075885
Vista	6193684282	7606914618	0	5/26/2012 13:20	29	6123075885
Azusa55	6193684282	1.09E+13	5	5/26/2012 13:20	2	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	5/26/2012 13:20	2	6123075885
SanDiego_48	6193684282	6193684282 F		5/27/2012 9:02	32	6123075885
Vista	6193684282	7606914740	0	5/27/2012 9:02	29	6123075885
Azusa55	6193684282	1.09E+13	5	5/27/2012 9:02	2	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	5/27/2012 9:02	2	6123075885
SanDiego_48	6193684282	6193684282 F		5/27/2012 16:10	11	9528520003
Vista	6193684282	7606914734	0	5/27/2012 16:10	8	9528520003
Azusa55	6193684282	1.09E+13	5	5/27/2012 16:11	4	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	5/27/2012 16:11	4	9528520003
SanDiego_48	6193684282	6193684282 F		6/1/2012 14:36	14	9528520003
Azusa55	6193684282	1.09E+13	5	6/1/2012 14:36	4	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	6/1/2012 14:36	4	9528520003
SanDiego_48	6193684282	6193684282 F		6/2/2012 11:49	32	6123075885
Vista	6193684282	7606914640	0	6/2/2012 11:49	29	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	6/2/2012 11:50	3	6123075885
Azusa55	6193684282	1.09E+13	5	6/2/2012 11:50	2	6123075885
SanDiego_48	6193684282	6193684282 F		6/2/2012 13:08	31	6123075885
Vista	6193684282	7606914740	0	6/2/2012 13:08	29	6123075885
Azusa55	6193684282	1.09E+13	5	6/2/2012 13:08	2	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	6/2/2012 13:08	2	6123075885
SanDiego_48	6193684282	6193684282 F		6/3/2012 8:12	4	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	6/3/2012 8:12	4	6123075885
Azusa55	6193684282	1.09E+13	5	6/3/2012 8:12	3	6123075885
SanDiego_48	6193684282	6193684282 F		6/4/2012 17:59	32	9528520003
Azusa55	6193684282	1.09E+13	5	6/4/2012 18:00	2	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	6/4/2012 18:00	2	9528520003
SanDiego_48	6193684282	6193684282 F		6/5/2012 13:42	33	9528520003
Vista	6193684282	7606914146	0	6/5/2012 13:42	30	9528520003
Azusa55	6193684282	1.09E+13	5	6/5/2012 13:43	2	9528520003
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	6/5/2012 13:43	2	9528520003
SanDiego_48	6193684282	6193684282 F		6/5/2012 16:16	33	9528520003
Vista	6193684282	7606914611	0	6/5/2012 16:16	30	9528520003

Azusa55	6193684282	1.09E+13	5	6/5/2012 16:16	3	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	6/5/2012 16:16	3	9528520003
SanDiego_48	6193684282	6193684282 F		6/6/2012 18:12	11	9528520003
Azusa55	6193684282	1.09E+13	5	6/6/2012 18:12	4	9528520003
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	6/6/2012 18:12	4	9528520003
SanDiego_48	6193684282	6193684282 F		6/9/2012 10:02	28	6123075885
Vista	6193684282	7606914669	0	6/9/2012 10:02	25	6123075885
Azusa55	6193684282	1.09E+13	5	6/9/2012 10:03	3	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	6/9/2012 10:03	3	6123075885
SanDiego_48	6193684282	6193684282 F		6/9/2012 11:00	32	6123075885
Vista	6193684282	7606914361	0	6/9/2012 11:00	29	6123075885
Azusa55	6193684282	1.09E+13	5	6/9/2012 11:01	3	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	6/9/2012 11:01	3	6123075885
SanDiego_48	6193684282	6193684282 F		6/9/2012 11:52	9	6123075885
Vista	6193684282	7606914750	0	6/9/2012 11:52	6	6123075885
Azusa55	6193684282	1.09E+13	5	6/9/2012 11:52	3	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	6/9/2012 11:52	3	6123075885
SanDiego_48	6193684282	6193684282 F		6/9/2012 12:36	16	6123075885
Vista	6193684282	7606914237	0	6/9/2012 12:36	13	6123075885
Azusa55	6193684282	1.09E+13	5	6/9/2012 12:36	3	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	6/9/2012 12:36	3	6123075885
SanDiego_48	6193684282	6193684282 F		6/13/2012 14:18	21	9528520003
Vista	6193684282	7606914740	0	6/13/2012 14:18	17	9528520003
Azusa55	6193684282	1.09E+13	5	6/13/2012 14:18	4	9528520003
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	6/13/2012 14:18	4	9528520003
SanDiego_48	6193684282	6193684282 F		6/16/2012 8:52	32	6123075885
Vista	6193684282	7606914682	0	6/16/2012 8:52	29	6123075885
Azusa55	6193684282	1.09E+13	5	6/16/2012 8:53	3	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	6/16/2012 8:53	3	6123075885
SanDiego_48	6193684282	6193684282 F		6/16/2012 11:16	31	6123075885
Vista	6193684282	7606914242	0	6/16/2012 11:16	29	6123075885
Azusa55	6193684282	1.09E+13	5	6/16/2012 11:17	2	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	6/16/2012 11:17	2	6123075885
SanDiego_48	6193684282	6193684282 F		6/16/2012 12:56	31	6123075885
Vista	6193684282	7606914521	0	6/16/2012 12:56	28	6123075885
Azusa55	6193684282	1.09E+13	5	6/16/2012 12:56	3	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	6/16/2012 12:56	3	6123075885

SanDiego_48	6193684282	6193684282 F	6/17/2012 10:12	33	6123075885
Vista	6193684282	7606914367	0 6/17/2012 10:12	30	6123075885
Azusa55	6193684282	1.09E+13	5 6/17/2012 10:12	2	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5 6/17/2012 10:12	2	6123075885
SanDiego_48	6193684282	6193684282 F	6/17/2012 16:23	31	9528520003
Vista	6193684282	7606914174	0 6/17/2012 16:23	27	9528520003
Azusa55	6193684282	1.09E+13	5 6/17/2012 16:23	3	9528520003
Marina_Pkt_Gtwy	6193684282	1.09E+13	5 6/17/2012 16:23	3	9528520003
SanDiego_48	6193684282	6193684282 F	6/22/2012 14:08	15	9528520003
Azusa55	6193684282	1.09E+13	5 6/22/2012 14:08	3	9528520003
Marina_Pkt_Gtwy	6193684282	1.09E+13	5 6/22/2012 14:08	3	9528520003
SanDiego_48	6193684282	6193684282 F	6/23/2012 8:41	22	6123075885
Vista	6193684282	7606914511	0 6/23/2012 8:41	18	6123075885
Azusa55	6193684282	1.09E+13	5 6/23/2012 8:41	2	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5 6/23/2012 8:41	2	6123075885
SanDiego_48	6193684282	6193684282 F	6/23/2012 11:44	31	6123075885
Vista	6193684282	7606914111	0 6/23/2012 11:44	27	6123075885
Azusa55	6193684282	1.09E+13	5 6/23/2012 11:44	2	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5 6/23/2012 11:44	2	6123075885
SanDiego_48	6193684282	6193684282 F	6/24/2012 10:20	31	6123075885
Vista	6193684282	7606914392	0 6/24/2012 10:20	29	6123075885
Azusa55	6193684282	1.09E+13	5 6/24/2012 10:20	2	6123075885
LosAngelesGateway	6193684282	1.09E+13	5 6/24/2012 10:20	2	6123075885
SanDiego_48	6193684282	6193684282 F	6/26/2012 17:50	30	9528520003
Azusa55	6193684282	1.09E+13	5 6/26/2012 17:51	3	9528520003
LosAngelesGateway	6193684282	1.09E+13	5 6/26/2012 17:51	3	9528520003
SanDiego_48	6193684282	6193684282 F	6/30/2012 8:05	14	6123075885
Vista	6193684282	7606914683	0 6/30/2012 8:05	10	6123075885
Azusa55	6193684282	1.09E+13	5 6/30/2012 8:05	4	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5 6/30/2012 8:05	4	6123075885
SanDiego_48	6193684282	6193684282 F	6/30/2012 11:02	31	6123075885
Vista	6193684282	7606914026	0 6/30/2012 11:02	27	6123075885
Azusa55	6193684282	1.09E+13	5 6/30/2012 11:02	3	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5 6/30/2012 11:02	3	6123075885
SanDiego_48	6193684282	6193684282 F	6/30/2012 13:26	14	6123075885
Azusa55	6193684282	1.09E+13	5 6/30/2012 13:26	4	6123075885
LosAngelesGateway	6193684282	1.09E+13	5 6/30/2012 13:26	4	6123075885

SanDiego_48	6193684282	6193684282 F		7/1/2012 8:19	30	6123075885
Vista	6193684282	7606914657	0	7/1/2012 8:19	27	6123075885
Azusa55	6193684282	1.09E+13	5	7/1/2012 8:19	2	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	7/1/2012 8:19	2	6123075885
SanDiego_48	6193684282	6193684282 F		7/7/2012 10:24	32	6123075885
Azusa55	6193684282	1.09E+13	5	7/7/2012 10:24	3	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	7/7/2012 10:24	3	6123075885
SanDiego_48	6193684282	6193684282 F		7/7/2012 13:17	30	6123075885
Vista	6193684282	7606914538	0	7/7/2012 13:17	27	6123075885
Azusa55	6193684282	1.09E+13	5	7/7/2012 13:18	3	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	7/7/2012 13:18	3	6123075885
SanDiego_48	6193684282	6193684282 F		7/8/2012 10:27	33	6123075885
Vista	6193684282	7606914615	0	7/8/2012 10:27	30	6123075885
Azusa55	6193684282	1.09E+13	5	7/8/2012 10:28	2	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	7/8/2012 10:28	2	6123075885
SanDiego_48	6193684282	6193684282 F		7/8/2012 16:45	29	9528520003
Vista	6193684282	7606914026	0	7/8/2012 16:45	27	9528520003
Azusa55	6193684282	1.09E+13	5	7/8/2012 16:46	2	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	7/8/2012 16:46	2	9528520003
SanDiego_48	6193684282	6193684282 F		7/12/2012 16:19	30	9528520003
Azusa55	6193684282	1.09E+13	5	7/12/2012 16:20	3	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	7/12/2012 16:20	3	9528520003
SanDiego_48	6193684282	6193684282 F		7/13/2012 11:54	33	9528520003
Vista	6193684282	7606914673	0	7/13/2012 11:54	30	9528520003
Azusa55	6193684282	1.09E+13	5	7/13/2012 11:54	3	9528520003
Naha_Pkt_Gtwy	6193684282	1.09E+13	5	7/13/2012 11:54	3	9528520003
SanDiego_48	6193684282	6193684282 F		7/13/2012 14:28	31	9528520003
Azusa55	6193684282	1.09E+13	5	7/13/2012 14:28	2	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	7/13/2012 14:28	2	9528520003
SanDiego_48	6193684282	6193684282 F		7/15/2012 10:21	31	6123075885
Vista	6193684282	7606914040	0	7/15/2012 10:21	26	6123075885
Azusa55	6193684282	1.09E+13	5	7/15/2012 10:21	4	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	7/15/2012 10:21	4	6123075885
SanDiego_48	6193684282	6193684282 F		7/15/2012 16:44	33	9528520003
Vista	6193684282	7606914043	0	7/15/2012 16:44	30	9528520003
Azusa55	6193684282	1.09E+13	5	7/15/2012 16:45	3	9528520003
*Marina_Pkt_Gtwy	6193684282	1.09E+13	5	7/15/2012 16:45	3	9528520003

SanDiego_48	6193684282	6193684282 F	7/21/2012 8:39	29	6123075885
Vista	6193684282	7606914131	0 7/21/2012 8:39	26	6123075885
Azusa55	6193684282	1.09E+13	5 7/21/2012 8:40	2	6123075885
LosAngelesGateway	6193684282	1.09E+13	5 7/21/2012 8:40	2	6123075885
SanDiego_48	6193684282	6193684282 F	7/21/2012 10:57	32	6123075885
Vista	6193684282	7606914564	0 7/21/2012 10:57	29	6123075885
Azusa55	6193684282	1.09E+13	5 7/21/2012 10:58	2	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5 7/21/2012 10:58	2	6123075885
SanDiego_48	6193684282	6193684282 F	7/21/2012 12:37	28	6123075885
Vista	6193684282	7606914701	0 7/21/2012 12:37	26	6123075885
Azusa55	6193684282	1.09E+13	5 7/21/2012 12:37	2	6123075885
LosAngelesGateway	6193684282	1.09E+13	5 7/21/2012 12:37	2	6123075885
SanDiego_48	6193684282	6193684282 F	7/22/2012 9:13	32	6123075885
Vista	6193684282	7606914846	0 7/22/2012 9:13	30	6123075885
Azusa55	6193684282	1.09E+13	5 7/22/2012 9:14	2	6123075885
LosAngelesGateway	6193684282	1.09E+13	5 7/22/2012 9:14	3	6123075885
SanDiego_48	6193684282	6193684282 F	7/22/2012 16:16	28	9528520003
Vista	6193684282	7606914401	0 7/22/2012 16:16	26	9528520003
Azusa55	6193684282	1.09E+13	5 7/22/2012 16:17	2	9528520003
Marina_Pkt_Gtwy	6193684282	1.09E+13	5 7/22/2012 16:17	2	9528520003
SanDiego_48	6193684282	6193684282 F	7/23/2012 14:12	30	9528520003
Vista	6193684282	7606914676	0 7/23/2012 14:12	27	9528520003
Azusa55	6193684282	1.09E+13	5 7/23/2012 14:13	3	9528520003
LosAngelesGateway	6193684282	1.09E+13	5 7/23/2012 14:13	3	9528520003
SanDiego_48	6193684282	6193684282 F	7/24/2012 16:29	30	9528520003
Vista	6193684282	7606914213	0 7/24/2012 16:29	27	9528520003
Azusa55	6193684282	1.09E+13	5 7/24/2012 16:30	3	9528520003
LosAngelesGateway	6193684282	1.09E+13	5 7/24/2012 16:30	3	9528520003
SanDiego_48	6193684282	6193684282 F	7/25/2012 16:52	34	9528520003
Vista	6193684282	7606914457	0 7/25/2012 16:52	32	9528520003
Azusa55	6193684282	1.09E+13	5 7/25/2012 16:53	2	9528520003
LosAngelesGateway	6193684282	1.09E+13	5 7/25/2012 16:53	2	9528520003
SanDiego_48	6193684282	6193684282 F	7/28/2012 8:10	33	6123075885
Vista	6193684282	7606914384	0 7/28/2012 8:10	30	6123075885
Azusa55	6193684282	1.09E+13	5 7/28/2012 8:11	4	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5 7/28/2012 8:11	4	6123075885
SanDiego_48	6193684282	6193684282 F	7/28/2012 10:53	28	6123075885

Vista	6193684282	7606914640	0	7/28/2012 10:53	25	6123075885
Azusa55	6193684282	1.09E+13	5	7/28/2012 10:53	3	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	7/28/2012 10:53	3	6123075885
SanDiego_48	6193684282	6193684282 F		7/28/2012 13:10	36	6123075885
Vista	6193684282	7606914496	0	7/28/2012 13:10	33	6123075885
Azusa55	6193684282	1.09E+13	5	7/28/2012 13:11	2	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	7/28/2012 13:11	2	6123075885
SanDiego_48	6193684282	6193684282 F		7/29/2012 8:15	29	6123075885
Vista	6193684282	7606914342	0	7/29/2012 8:15	26	6123075885
Azusa55	6193684282	1.09E+13	5	7/29/2012 8:15	3	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	7/29/2012 8:15	3	6123075885
SanDiego_48	6193684282	6193684282 F		7/30/2012 18:21	17	9528520003
Azusa55	6193684282	1.09E+13	5	7/30/2012 18:21	4	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	7/30/2012 18:21	4	9528520003
SanDiego_48	6193684282	6193684282 F		7/31/2012 14:16	31	9528520003
Vista	6193684282	7606914761	0	7/31/2012 14:17	28	9528520003
Azusa55	6193684282	1.09E+13	5	7/31/2012 14:17	2	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	7/31/2012 14:17	2	9528520003
SanDiego_48	6193684282	6193684282 F		8/4/2012 10:22	33	6123075885
Vista	6193684282	7606914803	0	8/4/2012 10:22	30	6123075885
Azusa55	6193684282	1.09E+13	5	8/4/2012 10:22	3	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	8/4/2012 10:22	2	6123075885
SanDiego_48	6193684282	6193684282 F		8/4/2012 12:04	10	6123075885
Vista	6193684282	7606914868	0	8/4/2012 12:04	6	6123075885
Azusa55	6193684282	1.09E+13	5	8/4/2012 12:04	4	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	8/4/2012 12:04	4	6123075885
SanDiego_48	6193684282	6193684282 F		8/5/2012 15:56	32	9528520003
Vista	6193684282	7606914527	0	8/5/2012 15:56	30	9528520003
Azusa55	6193684282	1.09E+13	5	8/5/2012 15:56	2	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	8/5/2012 15:56	2	9528520003
Azusa55	6193684282	1.09E+13	5	8/6/2012 14:52	4	9528520003
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	8/6/2012 14:52	4	9528520003
SanDiego_48	6193684282	6193684282 F		8/6/2012 14:52	3	9528520003
SanDiego_48	6193684282	6193684282 F		8/9/2012 16:25	33	9528520003
Azusa55	6193684282	1.09E+13	5	8/9/2012 16:25	6	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	8/9/2012 16:25	6	9528520003
SanDiego_48	6193684282	6193684282 F		8/11/2012 9:36	28	6123075885

Vista	6193684282	7606914571	0	8/11/2012 9:36	26	6123075885
Azusa55	6193684282	1.09E+13	5	8/11/2012 9:37	2	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	8/11/2012 9:37	2	6123075885
SanDiego_48	6193684282	6193684282 F		8/11/2012 12:22	29	6123075885
Vista	6193684282	7606914858	0	8/11/2012 12:22	26	6123075885
Azusa55	6193684282	1.09E+13	5	8/11/2012 12:22	3	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	8/11/2012 12:22	2	6123075885
SanDiego_48	6193684282	6193684282	0	8/12/2012 10:34	22	6123075885
SanDiego_48	6193684282	6193684282	0	8/12/2012 10:34	11	6123075885
SanDiego_48	6193684282	6193684282 F		8/12/2012 17:20	33	9528520003
Azusa55	6193684282	1.09E+13	5	8/12/2012 17:20	3	9528520003
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	8/12/2012 17:20	3	9528520003
SanDiego_48	6193684282	6193684282 F		8/13/2012 14:25	33	9528520003
Vista	6193684282	7606914269	0	8/13/2012 14:25	30	9528520003
Azusa55	6193684282	1.09E+13	5	8/13/2012 14:25	3	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	8/13/2012 14:25	3	9528520003
SanDiego_48	6193684282	6193684282 F		8/15/2012 16:34	33	9528520003
Azusa55	6193684282	1.09E+13	5	8/15/2012 16:34	3	9528520003
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	8/15/2012 16:34	3	9528520003
SanDiego_48	6193684282	6193684282 F		8/18/2012 9:32	28	6123075885
Vista	6193684282	7606914658	0	8/18/2012 9:32	26	6123075885
Azusa55	6193684282	1.09E+13	5	8/18/2012 9:32	2	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	8/18/2012 9:32	3	6123075885
SanDiego_48	6193684282	6193684282 F		8/18/2012 13:06	29	6123075885
Vista	6193684282	7606914139	0	8/18/2012 13:06	27	6123075885
A. a55	6193684282	1.09E+13	5	8/18/2012 13:07	2	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	8/18/2012 13:07	2	6123075885
SanDiego_48	6193684282	6193684282 F		8/19/2012 10:50	33	6123075885
Vista	6193684282	7606914311	0	8/19/2012 10:50	29	6123075885
Azusa55	6193684282	1.09E+13	5	8/19/2012 10:51	3	6123075885
LosAngelesGateway	6193684282	1.09E+13	5	8/19/2012 10:51	3	6123075885
SanDiego_48	6193684282	6193684282 F		8/20/2012 17:57	9	9528520003
Azusa55	6193684282	1.09E+13	5	8/20/2012 17:57	3	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	8/20/2012 17:57	3	9528520003
SanDiego_48	6193684282	6193684282 F		8/22/2012 14:19	30	9528520003
Azusa55	6193684282	1.09E+13	5	8/22/2012 14:19	3	9528520003
LosAngelesGateway	6193684282	1.09E+13	5	8/22/2012 14:19	3	9528520003

SanDiego_48	6193684282	6193684282 F	8/25/2012 8:53	8	6123075885
Vista	6193684282	7606914803	0 8/25/2012 8:53	5	6123075885
Azusa55	6193684282	1.09E+13	5 8/25/2012 8:53	3	6123075885
LosAngelesGateway	6193684282	1.09E+13	5 8/25/2012 8:53	3	6123075885
SanDiego_48	6193684282	6193684282 F	8/25/2012 13:13	32	6123075885
Vista	6193684282	7606914885	0 8/25/2012 13:13	29	6123075885
Azusa55	6193684282	1.09E+13	5 8/25/2012 13:13	3	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5 8/25/2012 13:13	3	6123075885
SanDiego_48	6193684282	6193684282 F	8/26/2012 9:25	30	6123075885
Vista	6193684282	7606914227	0 8/26/2012 9:25	28	6123075885
Azusa55	6193684282	1.09E+13	5 8/26/2012 9:25	2	6123075885
LosAngelesGateway	6193684282	1.09E+13	5 8/26/2012 9:25	2	6123075885
SanDiego_48	6193684282	6193684282 F	9/1/2012 8:13	30	6123075885
Vista	6193684282	7606914858	0 9/1/2012 8:13	26	6123075885
Azusa55	6193684282	1.09E+13	5 9/1/2012 8:14	3	6123075885
Marina_Pkt_Gtwy	6193684282	1.09E+13	5 9/1/2012 8:14	3	6123075885
SanDiego_48	6193684282	6193684282 F	9/1/2012 11:19	21	6123075885
Vista	6193684282	7606914625	0 9/1/2012 11:19	9	6123075885
Vista	6193684282	7606914625	0 9/1/2012 11:19	11	6123075885
SanDiego_48	6193684282	6193684282 F	9/2/2012 8:12	33	6123075885
Vista	6193684282	7606914430	0 9/2/2012 8:12	30	6123075885
Azusa55	6193684282	1.09E+13	5 9/2/2012 8:13	2	6123075885
LosAngelesGateway	6193684282	1.09E+13	5 9/2/2012 8:13	2	6123075885
SanDiego_48	6193684282	6193684282 F	9/4/2012 11:00	29	6237921070
Vista	6193684282	7606914646	0 9/4/2012 11:00	26	6237921070
Azusa55	6193684282	1.09E+13	5 9/4/2012 11:01	3	6237921070
Marina_Pkt_Gtwy	6193684282	1.09E+13	5 9/4/2012 11:01	3	6237921070
SanDiego_48	6193684282	6193684282 F	9/4/2012 13:52	33	6237921070
Vista	6193684282	7606914276	0 9/4/2012 13:52	30	6237921070
Azusa55	6193684282	1.09E+13	5 9/4/2012 13:52	3	6237921070
LosAngelesGateway	6193684282	1.09E+13	5 9/4/2012 13:52	3	6237921070
SanDiego_48	6193684282	6193684282 F	9/5/2012 12:08	29	6237921070
Azusa55	6193684282	1.09E+13	5 9/5/2012 12:08	3	6237921070
LosAngelesGateway	6193684282	1.09E+13	5 9/5/2012 12:08	3	6237921070
SanDiego_48	6193684282	6193684282 F	9/5/2012 16:05	29	6237921070
Azusa55	6193684282	1.09E+13	5 9/5/2012 16:05	2	6237921070
Marina_Pkt_Gtwy	6193684282	1.09E+13	5 9/5/2012 16:05	3	6237921070

SanDiego_48	6193684282	6193684282 F	9/6/2012 11:06	29	6123078559
Vista	6193684282	7606914071	0 9/6/2012 11:06	27	6123078559
Azusa55	6193684282	1.09E+13	5 9/6/2012 11:06	2	6123078559
LosAngelesGateway	6193684282	1.09E+13	5 9/6/2012 11:06	2	6123078559
SanDiego_48	6193684282	6193684282 F	9/6/2012 12:34	31	6123078559
Vista	6193684282	7606914356	0 9/6/2012 12:34	28	6123078559
Azusa55	6193684282	1.09E+13	5 9/6/2012 12:34	3	6123078559
LosAngelesGateway	6193684282	1.09E+13	5 9/6/2012 12:34	3	6123078559
SanDiego_48	6193684282	6193684282 F	9/6/2012 14:38	18	9528520005
Vista	6193684282	7606914370	0 9/6/2012 14:38	14	9528520005
Azusa55	6193684282	1.09E+13	5 9/6/2012 14:38	4	9528520005
Marina_Pkt_Gtwy	6193684282	1.09E+13	5 9/6/2012 14:38	4	9528520005
SanDiego_48	6193684282	6193684282 F	9/7/2012 11:58	32	6237921070
Azusa55	6193684282	1.09E+13	5 9/7/2012 11:59	3	6237921070
LosAngelesGateway	6193684282	1.09E+13	5 9/7/2012 11:59	3	6237921070
SanDiego_48	6193684282	6193684282 F	9/8/2012 11:26	29	6237921070
Vista	6193684282	7606914550	0 9/8/2012 11:26	25	6237921070
Azusa55	6193684282	1.09E+13	5 9/8/2012 11:26	2	6237921070
LosAngelesGateway	6193684282	1.09E+13	5 9/8/2012 11:26	2	6237921070
SanDiego_48	6193684282	6193684282 F	9/10/2012 16:53	33	9528520005
Azusa55	6193684282	1.09E+13	5 9/10/2012 16:54	2	9528520005
Marina_Pkt_Gtwy	6193684282	1.09E+13	5 9/10/2012 16:54	2	9528520005
SanDiego_48	6193684282	6193684282 F	9/11/2012 12:14	31	6237921070
Vista	6193684282	7606914209	0 9/11/2012 12:14	28	6237921070
Azusa55	6193684282	1.09E+13	5 9/11/2012 12:15	3	6237921070
LosAngelesGateway	6193684282	1.09E+13	5 9/11/2012 12:15	3	6237921070
SanDiego_48	6193684282	6193684282 F	9/12/2012 11:41	31	6123078559
Vista	6193684282	7606914548	0 9/12/2012 11:41	28	6123078559
Azusa55	6193684282	1.09E+13	5 9/12/2012 11:41	3	6123078559
LosAngelesGateway	6193684282	1.09E+13	5 9/12/2012 11:41	3	6123078559
SanDiego_48	6193684282	6193684282 F	9/12/2012 17:10	27	6123078559
Azusa55	6193684282	1.09E+13	5 9/12/2012 17:11	3	6123078559
LosAngelesGateway	6193684282	1.09E+13	5 9/12/2012 17:11	2	6123078559
SanDiego_48	6193684282	6193684282 F	9/13/2012 12:04	28	6123078559
Vista	6193684282	7606914609	0 9/13/2012 12:04	26	6123078559
Azusa55	6193684282	1.09E+13	5 9/13/2012 12:05	2	6123078559
LosAngelesGateway	6193684282	1.09E+13	5 9/13/2012 12:05	2	6123078559

SanDiego_48	6193684282	6193684282 F	9/13/2012 16:54	25	9528520005
Azusa55	6193684282	1.09E+13	5 9/13/2012 16:54	3	9528520005
LosAngelesGateway	6193684282	1.09E+13	5 9/13/2012 16:54	3	9528520005
SanDiego_48	6193684282	6193684282 F	9/14/2012 12:49	20	6237921070
Vista	6193684282	7606914820	0 9/14/2012 12:49	16	6237921070
Azusa55	6193684282	1.09E+13	5 9/14/2012 12:49	3	6237921070
LosAngelesGateway	6193684282	1.09E+13	5 9/14/2012 12:49	3	6237921070
SanDiego_48	6193684282	6193684282 F	9/15/2012 11:23	33	6237921070
Vista	6193684282	7606914162	0 9/15/2012 11:23	30	6237921070
Azusa55	6193684282	1.09E+13	5 9/15/2012 11:24	3	6237921070
LosAngelesGateway	6193684282	1.09E+13	5 9/15/2012 11:24	3	6237921070
SanDiego_48	6193684282	6193684282 F	9/15/2012 12:42	14	6237921070
Vista	6193684282	7606914733	0 9/15/2012 12:42	10	6237921070
Azusa55	6193684282	1.09E+13	5 9/15/2012 12:42	4	6237921070
LosAngelesGateway	6193684282	1.09E+13	5 9/15/2012 12:42	3	6237921070
SanDiego_48	6193684282	6193684282 F	9/17/2012 11:16	31	6237921070
Vista	6193684282	7606914139	0 9/17/2012 11:16	28	6237921070
Azusa55	6193684282	1.09E+13	5 9/17/2012 11:16	3	6237921070
Marina_Pkt_Gtwy	6193684282	1.09E+13	5 9/17/2012 11:16	3	6237921070
SanDiego_48	6193684282	6193684282 F	9/17/2012 15:26	32	9528520005
Azusa55	6193684282	1.09E+13	5 9/17/2012 15:27	3	9528520005
Marina_Pkt_Gtwy	6193684282	1.09E+13	5 9/17/2012 15:27	3	9528520005
Azusa55	6193684282	1.09E+13	5 9/17/2012 18:03	3	9528520005
Marina_Pkt_Gtwy	6193684282	1.09E+13	5 9/17/2012 18:03	4	9528520005
SanDiego_48	6193684282	6193684282 F	9/17/2012 18:03	3	9528520005
SanDiego_48	6193684282	6193684282 F	9/18/2012 11:55	29	6237921070
Vista	6193684282	7606914873	0 9/18/2012 11:55	26	6237921070
Azusa55	6193684282	1.09E+13	5 9/18/2012 11:55	3	6237921070
Marina_Pkt_Gtwy	6193684282	1.09E+13	5 9/18/2012 11:55	3	6237921070
SanDiego_48	6193684282	6193684282 F	9/19/2012 12:41	19	6237921070
Vista	6193684282	7606914423	0 9/19/2012 12:41	15	6237921070
Azusa55	6193684282	1.09E+13	5 9/19/2012 12:41	4	6237921070
LosAngelesGateway	6193684282	1.09E+13	5 9/19/2012 12:41	4	6237921070
SanDiego_48	6193684282	6193684282 F	9/19/2012 17:28	29	6237921070
Azusa55	6193684282	1.09E+13	5 9/19/2012 17:28	2	6237921070
Marina_Pkt_Gtwy	6193684282	1.09E+13	5 9/19/2012 17:28	2	6237921070
SanDiego_48	6193684282	6193684282 F	9/20/2012 12:27	40	6123078559

Vista	6193684282	7606914751	0	9/20/2012 12:27	36	6123078559
Azusa55	6193684282	1.09E+13	5	9/20/2012 12:28	4	6123078559
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	9/20/2012 12:28	4	6123078559
SanDiego_48	6193684282	6193684282 F		9/20/2012 17:24	31	6123078559
Vista	6193684282	7606914139	0	9/20/2012 17:24	29	6123078559
Azusa55	6193684282	1.09E+13	5	9/20/2012 17:25	3	6123078559
LosAngelesGateway	6193684282	1.09E+13	5	9/20/2012 17:25	3	6123078559
SanDiego_48	6193684282	6193684282 F		9/21/2012 12:21	32	6237921070
Vista	6193684282	7606914706	0	9/21/2012 12:21	29	6237921070
Azusa55	6193684282	1.09E+13	5	9/21/2012 12:21	3	6237921070
LosAngelesGateway	6193684282	1.09E+13	5	9/21/2012 12:21	3	6237921070
SanDiego_48	6193684282	6193684282 F		9/24/2012 11:28	30	9528520005
Vista	6193684282	7606914840	0	9/24/2012 11:28	27	9528520005
Azusa55	6193684282	1.09E+13	5	9/24/2012 11:28	2	9528520005
LosAngelesGateway	6193684282	1.09E+13	5	9/24/2012 11:28	2	9528520005
SanDiego_48	6193684282	6193684282 F		9/24/2012 16:00	32	9528520005
Vista_MTX2	6193684282	6193466833	0	9/24/2012 16:00	30	9528520005
SanDiego_48	6193684282	6193684282 F		9/25/2012 12:32	30	6237921070
Vista	6193684282	7606914750	0	9/25/2012 12:32	27	6237921070
Azusa55	6193684282	1.09E+13	5	9/25/2012 12:32	3	6237921070
LosAngelesGateway	6193684282	1.09E+13	5	9/25/2012 12:32	3	6237921070
SanDiego_48	6193684282	6193684282 F		9/27/2012 12:02	33	6123078559
Vista	6193684282	7606914243	0	9/27/2012 12:02	31	6123078559
Azusa55	6193684282	1.09E+13	5	9/27/2012 12:03	2	6123078559
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	9/27/2012 12:03	2	6123078559
SanDiego_48	6193684282	6193684282 F		9/27/2012 14:15	29	6123078559
Vista	6193684282	7606914258	0	9/27/2012 14:15	26	6123078559
Azusa55	6193684282	1.09E+13	5	9/27/2012 14:15	3	6123078559
LosAngelesGateway	6193684282	1.09E+13	5	9/27/2012 14:15	3	6123078559
SanDiego_48	6193684282	6193684282 F		9/27/2012 16:19	15	6123078559
Azusa55	6193684282	1.09E+13	5	9/27/2012 16:19	3	6123078559
LosAngelesGateway	6193684282	1.09E+13	5	9/27/2012 16:19	3	6123078559
SanDiego_48	6193684282	6193684282 F		10/1/2012 10:56	32	9528520005
Vista	6193684282	7606914706	0	10/1/2012 10:56	29	9528520005
Azusa55	6193684282	1.09E+13	5	10/1/2012 10:56	3	9528520005
LosAngelesGateway	6193684282	1.09E+13	5	10/1/2012 10:56	3	9528520005
SanDiego_48	6193684282	6193684282 F		10/1/2012 15:18	29	9528520005

Vista	6193684282	7606914191	0	10/1/2012 15:18	26	9528520005
Azusa55	6193684282	1.09E+13	5	10/1/2012 15:19	2	9528520005
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	10/1/2012 15:19	2	9528520005
SanDiego_48	6193684282	6193684282 F		10/2/2012 12:53	32	6237921070
Vista	6193684282	7606914472	0	10/2/2012 12:53	28	6237921070
Azusa55	6193684282	1.09E+13	5	10/2/2012 12:54	3	6237921070
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	10/2/2012 12:54	3	6237921070
SanDiego_48	6193684282	6193684282 F		10/4/2012 10:55	32	6123078559
Vista	6193684282	7606914706	0	10/4/2012 10:55	29	6123078559
Azusa55	6193684282	1.09E+13	5	10/4/2012 10:55	3	6123078559
LosAngelesGateway	6193684282	1.09E+13	5	10/4/2012 10:55	3	6123078559
SanDiego_48	6193684282	6193684282 F		10/4/2012 12:28	32	6123078559
Vista mtx2	6193684282	6193466144	0	10/4/2012 12:28	28	6123078559
SanDiego_48	6193684282	6193684282 F		10/4/2012 14:06	32	9528520005
Vista	6193684282	7606914423	0	10/4/2012 14:06	30	9528520005
Azusa55	6193684282	1.09E+13	5	10/4/2012 14:06	2	9528520005
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	10/4/2012 14:06	2	9528520005
SanDiego_48	6193684282	6193684282 F		10/4/2012 16:50	31	9528520005
Vista mtx2	6193684282	6193466666	0	10/4/2012 16:50	27	9528520005
SanDiego_48	6193684282	6193684282 F		10/5/2012 11:39	25	6237921070
Vista	6193684282	7606914071	0	10/5/2012 11:39	22	6237921070
Azusa55	6193684282	1.09E+13	5	10/5/2012 11:39	3	6237921070
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	10/5/2012 11:39	3	6237921070
SanDiego_48	6193684282	6193684282 F		10/6/2012 11:46	14	6237921070
Vista mtx2	6193684282	6193466330	0	10/6/2012 11:46	10	6237921070
SanDiego_48	6193684282	6193684282 F		10/8/2012 12:18	31	9528520005
Vista	6193684282	7606914408	0	10/8/2012 12:18	28	9528520005
Azusa55	6193684282	1.09E+13	5	10/8/2012 12:18	3	9528520005
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	10/8/2012 12:18	2	9528520005
SanDiego_48	6193684282	6193684282 F		10/8/2012 16:23	30	9528520005
Vista mtx2	6193684282	6193466367	0	10/8/2012 16:23	27	9528520005
SanDiego_48	6193684282	6193684282 F		10/9/2012 11:27	31	6237921070
Vista	6193684282	7606914007	0	10/9/2012 11:27	29	6237921070
Azusa55	6193684282	1.09E+13	5	10/9/2012 11:27	2	6237921070
LosAngelesGateway	6193684282	1.09E+13	5	10/9/2012 11:27	2	6237921070
SanDiego_48	6193684282	6193684282 F		10/11/2012 12:29	32	6123078559
Vista	6193684282	7606914262	0	10/11/2012 12:29	28	6123078559

Azusa55	6193684282	1.09E+13	5	10/11/2012 12:29	2	6123078559
LosAngelesGateway	6193684282	1.09E+13	5	10/11/2012 12:29	2	6123078559
SanDiego_48	6193684282	6193684282 F		10/11/2012 18:49	28	9528520005
Vista	6193684282	7606914040	0	10/11/2012 18:49	25	9528520005
Azusa55	6193684282	1.09E+13	5	10/11/2012 18:50	3	9528520005
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	10/11/2012 18:50	3	9528520005
SanDiego_48	6193684282	6193684282 F		10/12/2012 12:07	30	9528520005
Vista	6193684282	7606914751	0	10/12/2012 12:07	27	9528520005
Azusa55	6193684282	1.09E+13	5	10/12/2012 12:07	3	9528520005
LosAngelesGateway	6193684282	1.09E+13	5	10/12/2012 12:07	3	9528520005
SanDiego_48	6193684282	6193684282 F		10/13/2012 12:42	29	9528520005
V	6193684282	7606914836	0	10/13/2012 12:42	25	9528520005
Azusa55	6193684282	1.09E+13	5	10/13/2012 12:42	3	9528520005
LosAngelesGateway	6193684282	1.09E+13	5	10/13/2012 12:42	3	9528520005
SanDiego_48	6193684282	6193684282 F		10/15/2012 11:13	30	9528520005
Vista	6193684282	7606914803	0	10/15/2012 11:13	26	9528520005
Azusa55	6193684282	1.09E+13	5	10/15/2012 11:13	3	9528520005
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	10/15/2012 11:13	3	9528520005
SanDiego_48	6193684282	6193684282 F		10/15/2012 12:23	13	9528520005
Vista	6193684282	7606914748	0	10/15/2012 12:23	9	9528520005
Azusa55	6193684282	1.09E+13	5	10/15/2012 12:23	4	9528520005
LosAngelesGateway	6193684282	1.09E+13	5	10/15/2012 12:23	4	9528520005
SanDiego_48	6193684282	6193684282 F		10/15/2012 17:57	30	9528520005
Vista_MTX2	6193684282	6193466078	0	10/15/2012 17:57	27	9528520005
SanDiego_48	6193684282	6193684282 F		10/17/2012 12:13	25	6123078559
V	6193684282	7606914860	5	10/17/2012 12:13	21	6123078559
Azusa55	6193684282	1.09E+13	5	10/17/2012 12:13	3	6123078559
LosAngelesGateway	6193684282	1.09E+13	5	10/17/2012 12:13	2	6123078559
SanDiego_48	6193684282	6193684282 F		10/17/2012 16:17	31	6123078559
Vista	6193684282	7606914712	0	10/17/2012 16:17	28	6123078559
Azusa55	6193684282	1.09E+13	5	10/17/2012 16:17	3	6123078559
LosAngelesGateway	6193684282	1.09E+13	5	10/17/2012 16:17	3	6123078559
SanDiego_48	6193684282	6193684282	5	10/18/2012 12:38	5	6123078559
Vista	6193684282	7606914646	0	10/18/2012 12:38	5	6123078559
SanDiego_48	6193684282	6193684282 F		10/18/2012 17:11	32	9528520005
Vista	6193684282	7606914377	0	10/18/2012 17:11	28	9528520005
Azusa55	6193684282	1.09E+13	5	10/18/2012 17:11	3	9528520005

LosAngelesGateway	6193684282	1.09E+13	5	10/18/2012 17:11	3	9528520005
SanDiego_48	6193684282	6193684282 F	0	10/20/2012 12:24	34	9528520005
Vista	6193684282	7606914623	0	10/20/2012 12:24	31	9528520005
Azusa55	6193684282	1.09E+13	5	10/20/2012 12:25	3	9528520005
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	10/20/2012 12:25	3	9528520005
SanDiego_48	6193684282	6193684282 F	0	10/20/2012 13:08	21	6237921070
Vista_MTX2	6193684282	6193466636	0	10/20/2012 13:08	17	6237921070
SanDiego_48	6193684282	6193684282 F	0	10/22/2012 11:39	33	9528520005
Vista	6193684282	7606914685	0	10/22/2012 11:39	29	9528520005
Azusa55	6193684282	1.09E+13	5	10/22/2012 11:40	2	9528520005
LosAngelesGateway	6193684282	1.09E+13	5	10/22/2012 11:40	2	9528520005
Si_ego_48	6193684282	6193684282 F	0	10/23/2012 11:35	32	9528520005
Vista	6193684282	7606914355	0	10/23/2012 11:35	29	9528520005
Azusa55	6193684282	1.09E+13	5	10/23/2012 11:35	3	9528520005
LosAngelesGateway	6193684282	1.09E+13	5	10/23/2012 11:35	3	9528520005
SanDiego_48	6193684282	6193684282 F	0	10/23/2012 13:57	38	9528520005
Vista	6193684282	7606914356	0	10/23/2012 13:57	34	9528520005
Azusa55	6193684282	1.09E+13	5	10/23/2012 13:57	3	9528520005
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	10/23/2012 13:57	3	9528520005
SanDiego_48	6193684282	6193684282 F	0	10/24/2012 12:32	32	6123078559
Vista	6193684282	7606914384	0	10/24/2012 12:32	29	6123078559
Azusa55	6193684282	1.09E+13	5	10/24/2012 12:32	3	6123078559
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	10/24/2012 12:32	3	6123078559
SanDiego_48	6193684282	6193684282 F	0	10/24/2012 18:20	31	6123078559
Vista	6193684282	7606914013	0	10/24/2012 18:20	28	6123078559
Azusa55	6193684282	1.09E+13	5	10/24/2012 18:21	3	6123078559
LosAngelesGateway	6193684282	1.09E+13	5	10/24/2012 18:21	3	6123078559
SanDiego_48	6193684282	6193684282 F	0	10/25/2012 11:58	16	6123078559
Vista_MTX2	6193684282	6193466406	0	10/25/2012 11:58	12	6123078559
SanDiego_48	6193684282	6193684282 F	0	10/25/2012 16:00	10	9528520005
Vista_MTX2	6193684282	6193466484	0	10/25/2012 16:00	5	9528520005
SanDiego_48	6193684282	6193684282 F	0	10/27/2012 13:14	30	6237921070
Vista	6193684282	7606914401	0	10/27/2012 13:14	27	6237921070
Azusa55	6193684282	1.09E+13	5	10/27/2012 13:15	3	6237921070
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	10/27/2012 13:15	3	6237921070
SanDiego_48	6193684282	6193684282 F	0	10/29/2012 11:19	32	9528520005
Vista	6193684282	7606914541	0	10/29/2012 11:19	29	9528520005

Azusa55	6193684282	1.09E+13	5	10/29/2012 11:20	2	9528520005
LosAngelesGateway	6193684282	1.09E+13	5	10/29/2012 11:20	3	9528520005
SanDiego_48	6193684282	6193684282 F		10/29/2012 15:22	29	9528520005
Vista	6193684282	7606914682	0	10/29/2012 15:22	26	9528520005
Azusa55	6193684282	1.09E+13	5	10/29/2012 15:23	3	9528520005
LosAngelesGateway	6193684282	1.09E+13	5	10/29/2012 15:23	3	9528520005
SanDiego_48	6193684282	6193684282 F		10/29/2012 17:43	29	9528520005
Vista	6193684282	7606914435	0	10/29/2012 17:43	26	9528520005
Azusa55	6193684282	1.09E+13	5	10/29/2012 17:44	3	9528520005
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	10/29/2012 17:44	3	9528520005
SanDiego_48	6193684282	6193684282 F		10/30/2012 12:36	33	6237921070
Vista	6193684282	7606914032	0	10/30/2012 12:36	30	6237921070
Azusa55	6193684282	1.09E+13	5	10/30/2012 12:37	3	6237921070
LosAngelesGateway	6193684282	1.09E+13	5	10/30/2012 12:37	3	6237921070
SanDiego_48	6193684282	6193684282 F		10/30/2012 13:49	15	6237921070
Vista_mtx2	6193684282	6193466340	0	10/30/2012 13:49	12	6237921070
SanDiego_48	6193684282	6193684282 F		11/1/2012 11:32	32	6123078559
Vista	6193684282	7606914834	0	11/1/2012 11:32	30	6123078559
Azusa55	6193684282	1.09E+13	5	11/1/2012 11:33	2	6123078559
LosAngelesGateway	6193684282	1.09E+13	5	11/1/2012 11:33	2	6123078559
SanDiego_48	6193684282	6193684282 F		11/1/2012 15:22	33	9528520005
Vista	6193684282	7606914676	0	11/1/2012 15:22	30	9528520005
Azusa55	6193684282	1.09E+13	5	11/1/2012 15:23	2	9528520005
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	11/1/2012 15:23	2	9528520005
SanDiego_48	6193684282	6193684282 F		11/1/2012 17:35	19	9528520005
Vista	6193684282	7606914603	0	11/1/2012 17:35	14	9528520005
Azusa55	6193684282	1.09E+13	5	11/1/2012 17:35	4	9528520005
LosAngelesGateway	6193684282	1.09E+13	5	11/1/2012 17:35	4	9528520005
SanDiego_48	6193684282	6193684282 F		11/2/2012 11:24	28	9528520005
Vista_mtx2	6193684282	6193466117	0	11/2/2012 11:24	25	9528520005
SanDiego_48	6193684282	6193684282 F		11/5/2012 12:31	32	9528520005
Vista_mtx2	6193684282	6193466772	0	11/5/2012 12:31	28	9528520005
SanDiego_48	6193684282	6193684282 F		11/6/2012 11:55	38	6237921070
Vista	6193684282	7606914379	0	11/6/2012 11:55	35	6237921070
Azusa55	6193684282	1.09E+13	5	11/6/2012 11:56	3	6237921070
LosAngelesGateway	6193684282	1.09E+13	5	11/6/2012 11:56	3	6237921070
SanDiego_48	6193684282	6193684282 F		11/7/2012 15:47	31	6123078559

Vista mtx2	6193684282	6193466793	0	11/7/2012 15:47	28	6123078559
SanDiego_48	6193684282	6193684282 F		11/8/2012 11:25	29	6123078559
Vista mtx2	6193684282	6193466303	0	11/8/2012 11:25	26	6123078559
SanDiego_48	6193684282	6193684282 F		11/8/2012 14:42	28	9528520005
Vista mtx2	6193684282	6193466256	0	11/8/2012 14:42	26	9528520005
SanDiego_48	6193684282	6193684282 F		11/8/2012 17:55	33	9528520005
Vista mtx2	6193684282	6193466396	0	11/8/2012 17:55	30	9528520005
SanDiego_48	6193684282	6193684282 F		11/9/2012 11:50	30	6237921070
Vista mtx2	6193684282	6193466309	0	11/9/2012 11:50	27	6237921070
SanDiego_48	6193684282	6193684282 F		11/10/2012 13:14	21	6237921070
Vista	6193684282	7606914198	0	11/10/2012 13:14	17	6237921070
A 55	6193684282	1.09E+13	5	11/10/2012 13:14	4	6237921070
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	11/10/2012 13:14	4	6237921070
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	11/13/2012 12:05	4	6237921070
Azusa53	6193684282	1.09E+13	5	11/13/2012 12:05	4	6237921070
Vista mtx2	6193684282	6193684282 F		11/13/2012 12:05	4	6237921070
Vista mtx2	6193684282	6193684282 F		11/14/2012 11:47	19	6123078559
Vista	6193684282	7606914180	0	11/14/2012 11:47	15	6123078559
Vista mtx2	6193684282	6193684282 F		11/15/2012 11:44	31	6123078559
LosAngelesGateway	6193684282	1.09E+13	5	11/15/2012 11:45	2	6123078559
Azusa53	6193684282	1.09E+13	5	11/15/2012 11:45	2	6123078559
Vista mtx2	6193684282	6193684282 F		11/15/2012 12:24	28	6123078559
LosAngelesGateway	6193684282	1.09E+13	5	11/15/2012 12:25	2	6123078559
Azusa53	6193684282	1.09E+13	5	11/15/2012 12:25	2	6123078559
Vista mtx2	6193684282	6193684282 F		11/15/2012 16:03	33	9528520005
LosAngelesGateway	6193684282	1.09E+13	5	11/15/2012 16:03	4	9528520005
Azusa53	6193684282	1.09E+13	5	11/15/2012 16:03	4	9528520005
Vista mtx2	6193684282	6193684282 F		11/16/2012 12:37	28	6237921070
LosAngelesGateway	6193684282	1.09E+13	5	11/16/2012 12:38	2	6237921070
Azusa53	6193684282	1.09E+13	5	11/16/2012 12:38	2	6237921070
Vista mtx2	6193684282	6193684282 F		11/17/2012 13:25	32	6237921070
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	11/17/2012 13:25	3	6237921070
Azusa53	6193684282	1.09E+13	5	11/17/2012 13:25	3	6237921070
Vista mtx2	6193684282	6193684282 F		11/19/2012 11:39	33	9528520005
LosAngelesGateway	6193684282	1.09E+13	5	11/19/2012 11:40	3	9528520005
Azusa53	6193684282	1.09E+13	5	11/19/2012 11:40	3	9528520005
Vista mtx2	6193684282	6193684282 F		11/19/2012 16:32	30	9528520005

Vista	6193684282	7606914646	0	11/19/2012 16:32	27	9528520005
Vista_MTX2	6193684282	6193684282 F		11/20/2012 11:11	33	9528520005
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	11/20/2012 11:12	3	9528520005
Azusa53	6193684282	1.09E+13	5	11/20/2012 11:12	3	9528520005
Vista_MTX2	6193684282	6193684282 F		11/21/2012 12:36	33	6123078559
LosAngelesGateway	6193684282	1.09E+13	5	11/21/2012 12:36	3	6123078559
Azusa53	6193684282	1.09E+13	5	11/21/2012 12:36	3	6123078559
Vista_MTX2	6193684282	6193684282 F		11/23/2012 13:16	29	6237921070
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	11/23/2012 13:16	3	6237921070
Azusa53	6193684282	1.09E+13	5	11/23/2012 13:16	3	6237921070
Vista_MTX2	6193684282	6193684282 F		11/26/2012 11:27	31	9528520005
V:	6193684282	7606914131	0	11/26/2012 11:27	29	9528520005
Vista_MTX2	6193684282	6193684282 F		11/27/2012 13:22	33	6237921070
Vista	6193684282	7606914539	0	11/27/2012 13:22	30	6237921070
Vista_MTX2	6193684282	6193684282 F		11/29/2012 13:02	30	6123078559
LosAngelesGateway	6193684282	1.09E+13	5	11/29/2012 13:02	3	6123078559
Azusa53	6193684282	1.09E+13	5	11/29/2012 13:02	3	6123078559
Vista_MTX2	6193684282	6193684282 F		12/3/2012 11:03	9	9528520005
Vista	6193684282	7606914491	0	12/3/2012 11:03	6	9528520005
Vista_MTX2	6193684282	6193684282 F		12/4/2012 11:00	11	6237921070
Vista	6193684282	7606914549	0	12/4/2012 11:00	7	6237921070
Vista_MTX2	6193684282	6193684282 F		12/4/2012 12:50	29	6123078559
Vista	6193684282	7606914545	0	12/4/2012 12:50	27	6123078559
Vista_MTX2	6193684282	6193684282 F		12/5/2012 11:01	30	6123078559
Vista	6193684282	7606914551	0	12/5/2012 11:01	27	6123078559
V_MTX2	6193684282	6193684282 F		12/5/2012 16:27	10	6123078559
LosAngelesGateway	6193684282	1.09E+13	5	12/5/2012 16:27	3	6123078559
Azusa53	6193684282	1.09E+13	5	12/5/2012 16:27	3	6123078559
Vista_MTX2	6193684282	6193684282 F		12/6/2012 11:10	20	6123078559
LosAngelesGateway	6193684282	1.09E+13	5	12/6/2012 11:10	3	6123078559
Azusa53	6193684282	1.09E+13	5	12/6/2012 11:10	3	6123078559
Vista_MTX2	6193684282	6193684282 F		12/6/2012 14:22	29	9528520005
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	12/6/2012 14:23	4	9528520005
Azusa53	6193684282	1.09E+13	5	12/6/2012 14:23	4	9528520005
Vista_MTX2	6193684282	6193684282 F		12/7/2012 11:28	12	6237921070
Vista	6193684282	7606914155	0	12/7/2012 11:28	8	6237921070
Vista_MTX2	6193684282	6193684282 F		12/8/2012 11:31	31	6237921070

Vista	6193684282	7606914618	0	12/8/2012 11:31	28	6237921070
Vista_MTX2	6193684282	6193684282 F		12/10/2012 12:19	11	9528520005
Vista	6193684282	7606914585	0	12/10/2012 12:19	8	9528520005
Vista_MTX2	6193684282	6193684282 F		12/10/2012 17:00	33	9528520005
Vista	6193684282	7606914514	0	12/10/2012 17:00	30	9528520005
Vista_MTX2	6193684282	6193684282 F		12/11/2012 11:21	18	6237921070
LosAngelesGateway	6193684282	1.09E+13	5	12/11/2012 11:21	4	6237921070
Azusa53	6193684282	1.09E+13	5	12/11/2012 11:21	4	6237921070
Vista_MTX2	6193684282	6193684282 F		12/11/2012 12:43	32	9528520005
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	12/11/2012 12:44	3	9528520005
Azusa53	6193684282	1.09E+13	5	12/11/2012 12:44	3	9528520005
V_MTX2	6193684282	6193684282 F		12/12/2012 12:11	30	6123078559
Vista	6193684282	7606914006	0	12/12/2012 12:11	27	6123078559
Vista_MTX2	6193684282	6193684282 F		12/13/2012 12:04	32	6123078559
Vista	6193684282	7606914082	0	12/13/2012 12:04	29	6123078559
Vista_MTX2	6193684282	6193684282 F		12/17/2012 11:45	32	6123078559
Vista	6193684282	7606914164	0	12/17/2012 11:45	29	6123078559
Vista_MTX2	6193684282	6193684282 F		12/17/2012 14:36	13	9528520005
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	12/17/2012 14:36	5	9528520005
Azusa53	6193684282	1.09E+13	5	12/17/2012 14:36	5	9528520005
Vista_MTX2	6193684282	6193684282 F		12/17/2012 17:49	31	9528520005
LosAngelesGateway	6193684282	1.09E+13	5	12/17/2012 17:50	3	9528520005
Azusa53	6193684282	1.09E+13	5	12/17/2012 17:50	3	9528520005
Vista_MTX2	6193684282	6193684282 F		12/19/2012 13:12	28	6123078559
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	12/19/2012 13:12	2	6123078559
Azusa53	6193684282	1.09E+13	5	12/19/2012 13:12	2	6123078559
Vista_MTX2	6193684282	6193684282 F		12/20/2012 12:52	34	6123078559
LosAngelesGateway	6193684282	1.09E+13	5	12/20/2012 12:53	4	6123078559
Azusa53	6193684282	1.09E+13	5	12/20/2012 12:53	4	6123078559
Vista_MTX2	6193684282	6193684282 F		12/20/2012 17:34	13	9528520005
LosAngelesGateway	6193684282	1.09E+13	5	12/20/2012 17:34	4	9528520005
Azusa53	6193684282	1.09E+13	5	12/20/2012 17:34	4	9528520005
Vista_MTX2	6193684282	6193684282 F		12/31/2012 10:58	30	9528520005
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	12/31/2012 10:58	3	9528520005
Azusa53	6193684282	1.09E+13	5	12/31/2012 10:58	3	9528520005
Vista_MTX2	6193684282	6193684282 F		12/31/2012 14:10	30	9528520005
Marina_Pkt_Gtwy	6193684282	1.09E+13	5	12/31/2012 14:11	3	9528520005

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
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 TELEPHONE NO.: (760) 450-3333 FAX NO.: (760) 720-6082
 ATTORNEY FOR (Name): Elena Reese

SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Diego
 STREET ADDRESS: 325 S. Melrose
 MAILING ADDRESS: 325 S. Melrose
 CITY AND ZIP CODE: Vista, CA 92081
 BRANCH NAME: North County Division

FOR COURT USE ONLY
FILED
 NORTH COUNTY DIVISION
 2013 JUL 30 PM 3:44
 (10)
 CLERK-SUPERIOR COURT
 SAN DIEGO COUNTY, CA

CASE NAME:
 Elena Reese v. Target Corporate Services, and Does 1 through 10, incl.

CIVIL CASE COVER SHEET		Complex Case Designation	CASE NUMBER:
<input checked="" type="checkbox"/> Unlimited <input type="checkbox"/> Limited (Amount demanded exceeds \$25,000) (Amount demanded is \$25,000 or less)		<input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	37-2013-00060117-CU-MC-NC
			JUDGE:
			DEPT:

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

Auto Tort

Auto (22)
 Uninsured motorist (46)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

Asbestos (04)
 Product liability (24)
 Medical malpractice (45)
 Other PI/PD/WD (23)

Non-PI/PD/WD (Other) Tort

Business tort/unfair business practice (07)
 Civil rights (08)
 Defamation (13)
 Fraud (16)
 Intellectual property (19)
 Professional negligence (25)
 Other non-PI/PD/WD tort (35)

Employment

Wrongful termination (36)
 Other employment (15)

Contract

Breach of contract/warranty (06)
 Rule 3.740 collections (09)
 Other collections (09)
 Insurance coverage (18)
 Other contract (37)

Real Property

Eminent domain/inverse condemnation (14)
 Wrongful eviction (33)
 Other real property (26)

Unlawful Detainer

Commercial (31)
 Residential (32)
 Drugs (38)

Judicial Review

Asset forfeiture (05)
 Petition re: arbitration award (11)
 Writ of mandate (02)
 Other judicial review (39)

Provisionally Complex Civil Litigation

(Cal. Rules of Court, rules 3.400-3.403)
 Antitrust/Trade regulation (03)
 Construction defect (10)
 Mass tort (40)
 Securities litigation (28)
 Environmental/Toxic tort (30)
 Insurance coverage claims arising from the above listed provisionally complex case types (41)

Enforcement of Judgment

Enforcement of judgment (20)

Miscellaneous Civil Complaint

RICO (27)
 Other complaint (not specified above) (42)

Miscellaneous Civil Petition

Partnership and corporate governance (21)
 Other petition (not specified above) (43)

2. This case is is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

a. Large number of separately represented parties d. Large number of witnesses
 b. Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve e. Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
 c. Substantial amount of documentary evidence f. Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive

4. Number of causes of action (specify): 10

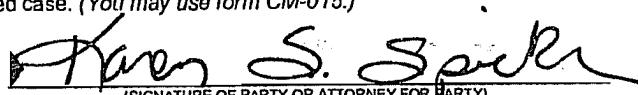
5. This case is is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: July 30, 2013

Karen S. Spicker, Esq.

(TYPE OR PRINT NAME)


 (SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

CM-010

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check one box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the primary cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES	
Auto Tort	Contract
Auto (22)–Personal Injury/Property	Breach of Contract/Warranty (06)
Damage/Wrongful Death	Breach of Rental/Lease
Uninsured Motorist (46) (<i>if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto</i>)	Contract (<i>not unlawful detainer or wrongful eviction</i>)
Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort	Contract/Warranty Breach–Seller
Asbestos (04)	Plaintiff (<i>not fraud or negligence</i>)
Asbestos Property Damage	Negligent Breach of Contract/
Asbestos Personal Injury/ Wrongful Death	Warranty
Product Liability (<i>not asbestos or toxic/environmental</i>) (24)	Other Breach of Contract/Warranty
Medical Malpractice (45)	Collections (e.g., money owed, open book accounts) (09)
Medical Malpractice– Physicians & Surgeons	Collection Case–Seller Plaintiff
Other Professional Health Care Malpractice	Other Promissory Note/Collections Case
Other PI/PD/WD (23)	Insurance Coverage (<i>not provisionally complex</i>) (18)
Premises Liability (e.g., slip and fall)	Auto Subrogation
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)	Other Coverage
Intentional Infliction of Emotional Distress	Other Contract (37)
Negligent Infliction of Emotional Distress	Contractual Fraud
Other PI/PD/WD	Other Contract Dispute
Non-PI/PD/WD (Other) Tort	Real Property
Business Tort/Unfair Business Practice (07)	Eminent Domain/Inverse Condemnation (14)
Civil Rights (e.g., discrimination, false arrest) (<i>not civil harassment</i>) (08)	Wrongful Eviction (33)
Defamation (e.g., slander, libel) (13)	Other Real Property (e.g., quiet title) (26)
Fraud (16)	Writ of Possession of Real Property
Intellectual Property (19)	Mortgage Foreclosure
Professional Negligence (25)	Quiet Title
Legal Malpractice	Other Real Property (<i>not eminent domain, landlord/tenant, or foreclosure</i>)
Other Professional Malpractice (<i>not medical or legal</i>)	Unlawful Detainer
Other Non-PI/PD/WD Tort (35)	Commercial (31)
Employment	Residential (32)
Wrongful Termination (36)	Drugs (38) (<i>if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential</i>)
Other Employment (15)	Judicial Review
	Asset Forfeiture (05)
	Petition Re: Arbitration Award (11)
	Writ of Mandate (02)
	Writ–Administrative Mandamus
	Writ–Mandamus on Limited Court Case Matter
	Writ–Other Limited Court Case Review
	Other Judicial Review (39)
	Review of Health Officer Order
	Notice of Appeal–Labor Commissioner Appeals
	Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)
	Antitrust/Trade Regulation (03)
	Construction Defect (10)
	Claims Involving Mass Tort (40)
	Securities Litigation (28)
	Environmental/Toxic Tort (30)
	Insurance Coverage Claims (<i>arising from provisionally complex case type listed above</i>) (41)
	Enforcement of Judgment
	Enforcement of Judgment (20)
	Abstract of Judgment (Out of County)
	Confession of Judgment (<i>non-domestic relations</i>)
	Sister State Judgment
	Administrative Agency Award (<i>not unpaid taxes</i>)
	Petition/Certification of Entry of Judgment on Unpaid Taxes
	Other Enforcement of Judgment Case
	Miscellaneous Civil Complaint
	RICO (27)
	Other Complaint (<i>not specified above</i>) (42)
	Declaratory Relief Only
	Injunctive Relief Only (<i>non-harassment</i>)
	Mechanics Lien
	Other Commercial Complaint Case (<i>non-tort/non-complex</i>)
	Other Civil Complaint (<i>non-tort/non-complex</i>)
	Miscellaneous Civil Petition
	Partnership and Corporate Governance (21)
	Other Petition (<i>not specified above</i>) (43)
	Civil Harassment
	Workplace Violence
	Elder/Dependent Adult Abuse
	Election Contest
	Petition for Name Change
	Petition for Relief From Late Claim
	Other Civil Petition



SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO

ALTERNATIVE DISPUTE RESOLUTION (ADR) INFORMATION

CASE NUMBER: 37-2013-00060117-CU-MC-NC CASE TITLE:

Reese vs. Target Corporate Services, Inc.

NOTICE: All plaintiffs/cross-complainants in a general civil case are required to serve a copy of the following three forms on each defendant/cross-defendant, together with the complaint/cross-complaint:

- (1) this Alternative Dispute Resolution (ADR) Information form (SDSC form #CIV-730),
- (2) the Stipulation to Use Alternative Dispute Resolution (ADR) form (SDSC form #CIV-359), **and**
- (3) the Notice of Case Assignment form (SDSC form #CIV-721).

Most civil disputes are resolved without filing a lawsuit, and most civil lawsuits are resolved without a trial. The courts, community organizations, and private providers offer a variety of Alternative Dispute Resolution (ADR) processes to help people resolve disputes without a trial. The San Diego Superior Court expects that litigants will utilize some form of ADR as a mechanism for case settlement before trial, and it may be beneficial to do this early in the case.

Below is some information about the potential advantages and disadvantages of ADR, the most common types of ADR, and how to find a local ADR program or neutral. A form for agreeing to use ADR is attached (SDSC form #CIV-359).

Potential Advantages and Disadvantages of ADR

ADR may have a variety of advantages or disadvantages over a trial, depending on the type of ADR process used and the particular case:

Potential Advantages

- Saves time
- Saves money
- Gives parties more control over the dispute resolution process and outcome
- Preserves or improves relationships

Potential Disadvantages

- May take more time and money if ADR does not resolve the dispute
- Procedures to learn about the other side's case (discovery), jury trial, appeal, and other court protections may be limited or unavailable

Most Common Types of ADR

You can read more information about these ADR processes and watch videos that demonstrate them on the court's ADR webpage at <http://www.sdcourt.ca.gov/adr>.

Mediation: A neutral person called a "mediator" helps the parties communicate in an effective and constructive manner so they can try to settle their dispute. The mediator does not decide the outcome, but helps the parties to do so.

Mediation is usually confidential, and may be particularly useful when parties want or need to have an ongoing relationship, such as in disputes between family members, neighbors, co-workers, or business partners, or when parties want to discuss non-legal concerns or creative resolutions that could not be ordered at a trial.

Settlement Conference: A judge or another neutral person called a "settlement officer" helps the parties to understand the strengths and weaknesses of their case and to discuss settlement. The judge or settlement officer does not make a decision in the case but helps the parties to negotiate a settlement. Settlement conferences may be particularly helpful when the parties have very different ideas about the likely outcome of a trial and would like an experienced neutral to help guide them toward a resolution.

Arbitration: A neutral person called an "arbitrator" considers arguments and evidence presented by each side and then decides the outcome of the dispute. Arbitration is less formal than a trial, and the rules of evidence are usually relaxed. If the parties agree to binding arbitration, they waive their right to a trial and agree to accept the arbitrator's decision as final. With nonbinding arbitration, any party may reject the arbitrator's decision and request a trial. Arbitration may be appropriate when the parties want another person to decide the outcome of their dispute but would like to avoid the formality, time, and expense of a trial.

Other ADR Processes: There are several other types of ADR which are not offered through the court but which may be obtained privately, including neutral evaluation, conciliation, fact finding, mini-trials, and summary jury trials. Sometimes parties will try a combination of ADR processes. The important thing is to try to find the type or types of ADR that are most likely to resolve your dispute. Be sure to learn about the rules of any ADR program and the qualifications of any neutral you are considering, and about their fees.

Local ADR Programs for Civil Cases

Mediation: The San Diego Superior Court maintains a Civil Mediation Panel of approved mediators who have met certain minimum qualifications and have agreed to charge \$150 per hour for each of the first two (2) hours of mediation and their regular hourly rate thereafter in court-referred mediations.

On-line mediator search and selection: Go to the court's ADR webpage at www.sdcourt.ca.gov/adr and click on the "Mediator Search" to review individual mediator profiles containing detailed information about each mediator including their dispute resolution training, relevant experience, ADR specialty, education and employment history, mediation style, and fees and to submit an on-line Mediator Selection Form (SDSC form #CIV-005). The Civil Mediation Panel List, the Available Mediator List, individual Mediator Profiles, and Mediator Selection Form (CIV-005) can also be printed from the court's ADR webpage and are available at the Mediation Program Office or Civil Business Office at each court location.

Settlement Conference: The judge may order your case to a mandatory settlement conference, or voluntary settlement conferences may be requested from the court if the parties certify that: (1) settlement negotiations between the parties have been pursued, demands and offers have been tendered in good faith, and resolution has failed; (2) a judicially supervised settlement conference presents a substantial opportunity for settlement; and (3) the case has developed to a point where all parties are legally and factually prepared to present the issues for settlement consideration and further discovery for settlement purposes is not required. Refer to SDSC Local Rule 2.2.1 for more information. To schedule a settlement conference, contact the department to which your case is assigned.

Arbitration: The San Diego Superior Court maintains a panel of approved judicial arbitrators who have practiced law for a minimum of five years and who have a certain amount of trial and/or arbitration experience. Refer to SDSC Local Rules Division II, Chapter III and Code Civ. Proc. § 1141.10 et seq or contact the Arbitration Program Office at (619) 450-7300 for more information.

More information about court-connected ADR: Visit the court's ADR webpage at www.sdcourt.ca.gov/adr or contact the court's Mediation/Arbitration Office at (619) 450-7300.

Dispute Resolution Programs Act (DRPA) funded ADR Programs: The following community dispute resolution programs are funded under DRPA (Bus. and Prof. Code §§ 465 et seq.):

- In Central, East, and South San Diego County, contact the National Conflict Resolution Center (NCRC) at www.ncrconline.com or (619) 238-2400.
- In North San Diego County, contact North County Lifeline, Inc. at www.nclifeline.org or (760) 726-4900.

Private ADR: To find a private ADR program or neutral, search the Internet, your local telephone or business directory, or legal newspaper for dispute resolution, mediation, settlement, or arbitration services.

Legal Representation and Advice

To participate effectively in ADR, it is generally important to understand your legal rights and responsibilities and the likely outcomes if you went to trial. ADR neutrals are not allowed to represent or to give legal advice to the participants in the ADR process. If you do not already have an attorney, the California State Bar or your local County Bar Association can assist you in finding an attorney. Information about obtaining free and low cost legal assistance is also available on the California courts website at www.courtinfo.ca.gov/selfhelp/lowcost.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO		FOR COURT USE ONLY
STREET ADDRESS: 325 S. Melrose		
MAILING ADDRESS: 325 S. Melrose		
CITY, STATE, & ZIP CODE: Vista, CA 92081-6695		
BRANCH NAME: North County		
PLAINTIFF(S): Elena Reese		
DEFENDANT(S): Target Corporate Services, Inc.		
SHORT TITLE: REESE VS. TARGET CORPORATE SERVICES, INC. [IMAGED]		
STIPULATION TO USE ALTERNATIVE DISPUTE RESOLUTION (ADR)		CASE NUMBER: 37-2013-00060117-CU-MC-NC

Judge: Timothy M. Casserly

Department: N-31

The parties and their attorneys stipulate that the matter is at issue and the claims in this action shall be submitted to the following alternative dispute resolution (ADR) process. Selection of any of these options will not delay any case management timelines.

<input type="checkbox"/> Mediation (court-connected)	<input type="checkbox"/> Non-binding private arbitration
<input type="checkbox"/> Mediation (private)	<input type="checkbox"/> Binding private arbitration
<input type="checkbox"/> Voluntary settlement conference (private)	<input type="checkbox"/> Non-binding judicial arbitration (discovery until 15 days before trial)
<input type="checkbox"/> Neutral evaluation (private)	<input type="checkbox"/> Non-binding judicial arbitration (discovery until 30 days before trial)
<input type="checkbox"/> Other (specify e.g., private mini-trial, private judge, etc.): _____	

It is also stipulated that the following shall serve as arbitrator, mediator or other neutral: (Name) _____

Alternate neutral (for court Civil Mediation Program and arbitration only): _____

Date: _____

Date: _____

Name of Plaintiff

Name of Defendant

Signature

Signature

Name of Plaintiff's Attorney

Name of Defendant's Attorney

Signature

Signature

If there are more parties and/or attorneys, please attach additional completed and fully executed sheets.

It is the duty of the parties to notify the court of any settlement pursuant to Cal. Rules of Court, rule 3.1385. Upon notification of the settlement, the court will place this matter on a 45-day dismissal calendar.

No new parties may be added without leave of court.

IT IS SO ORDERED.

Dated: 07/30/2013

JUDGE OF THE SUPERIOR COURT

SDSC CIV-359 (Rev 12-10)

STIPULATION TO USE OF ALTERNATIVE DISPUTE RESOLUTION

Page: 1

Exhibit A 071

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO	
STREET ADDRESS: 325 S Melrose DRIVE	
MAILING ADDRESS: 325 S Melrose DRIVE	
CITY AND ZIP CODE: Vista, CA 92081-6695	
BRANCH NAME: North County	
TELEPHONE NUMBER: (760) 201-8031	
PLAINTIFF(S) / PETITIONER(S): Elena Reese	
DEFENDANT(S) / RESPONDENT(S): Target Corporate Services, Inc.	
REESE VS. TARGET CORPORATE SERVICES, INC. [IMAGED]	
NOTICE OF CASE ASSIGNMENT and CASE MANAGEMENT CONFERENCE	CASE NUMBER: 37-2013-00060117-CU-MC-NC

CASE ASSIGNMENT

Judge: Timothy M. Casserly

Department: N-31

COMPLAINT/PETITION FILED: 07/30/2013

TYPE OF HEARING SCHEDULED	DATE	TIME	DEPT	JUDGE
Civil Case Management Conference	04/04/2014	09:00 am	N-31	Timothy M. Casserly

A case management statement must be completed by counsel for all parties or self-represented litigants and timely filed with the court at least 15 days prior to the initial case management conference. (San Diego Local Rules, Division II, CRC Rule 3.725).

All counsel of record or parties in pro per shall appear at the Case Management Conference, be familiar with the case, and be fully prepared to participate effectively in the hearing, including discussions of ADR* options.

IT IS THE DUTY OF EACH PLAINTIFF (AND CROSS-COMPLAINANT) TO SERVE A COPY OF THIS NOTICE WITH THE COMPLAINT (AND CROSS-COMPLAINT), THE ALTERNATIVE DISPUTE RESOLUTION (ADR) INFORMATION FORM (SDSC FORM #CIV-730), A STIPULATION TO USE ALTERNATIVE DISPUTE RESOLUTION (ADR) (SDSC FORM #CIV-359), AND OTHER DOCUMENTS AS SET OUT IN SDSC LOCAL RULE 2.1.5.

ALL COUNSEL WILL BE EXPECTED TO BE FAMILIAR WITH SUPERIOR COURT RULES WHICH HAVE BEEN PUBLISHED AS DIVISION II, AND WILL BE STRICTLY ENFORCED.

TIME STANDARDS: The following timeframes apply to general civil cases and must be adhered to unless you have requested and been granted an extension of time. General civil cases consist of all civil cases except: small claims proceedings, civil petitions, unlawful detainer proceedings, probate, guardianship, conservatorship, juvenile, parking citation appeals, and family law proceedings.

COMPLAINTS: Complaints and all other documents listed in SDSC Local Rule 2.1.5 must be served on all named defendants, and a Certificate of Service (SDSC form #CIV-345) filed within 60 days of filing.

DEFENDANT'S APPEARANCE: Defendant must generally appear within 30 days of service of the complaint. (Plaintiff may stipulate to no more than 15 day extension which must be in writing and filed with the Court.) (SDSC Local Rule 2.1.6)

JURY FEES: In order to preserve the right to a jury trial, each party demanding a jury trial shall pay an advance jury fee in the amount of one hundred fifty dollars (\$150) for each party on or before the date scheduled for the initial case management conference in the action.

***ALTERNATIVE DISPUTE RESOLUTION (ADR):** THE COURT ENCOURAGES YOU TO CONSIDER UTILIZING VARIOUS ALTERNATIVES TO TRIAL, INCLUDING MEDIATION AND ARBITRATION, PRIOR TO THE CASE MANAGEMENT CONFERENCE. PARTIES MAY FILE THE ATTACHED STIPULATION TO USE ALTERNATIVE DISPUTE RESOLUTION (SDSC FORM #CIV-359).

Superior Court of California
County of San Diego

NOTICE OF ASSIGNMENT
TO IMAGING DEPARTMENT

This case has been assigned to an Imaging Department and original documents attached to pleadings filed with the court will be imaged and destroyed. Original documents should not be filed with pleadings. If necessary, they should be lodged with the court under California Rules of Court, rule 3.1302(b).

On August 1, 2011 the San Diego Superior Court began the Electronic Filing and Imaging Pilot Program ("Program"). As of August 1, 2011 in all new cases assigned to an Imaging Department all filings will be imaged electronically and the electronic version of the document will be the official court file. The official court file will be electronic and accessible at one of the kiosks located in the Civil Business Office and on the Internet through the court's website. This Program will be expanding to other civil courtrooms over time.

You should be aware that the electronic copy of the filed document(s) will be the official court record pursuant to Government Code section 68150. The paper filing will be imaged and held for 30 days. After that time it will be destroyed and recycled. **Thus, you should not attach any original documents to pleadings filed with the San Diego Superior Court. Original documents filed with the court will be imaged and destroyed except those documents specified in California Rules of Court, rule 3.1806.** Any original documents necessary for a motion hearing or trial shall be lodged in advance of the hearing pursuant to California Rules of Court, rule 3.1302(b).

It is the duty of each plaintiff, cross-complainant or petitioner to serve a copy of this notice with the complaint, cross-complaint or petition on all parties in the action.

On all pleadings filed after the initial case originating filing, all parties must, to the extent it is feasible to do so, place the words "**IMAGED FILE**" in all caps immediately under the title of the pleading on all subsequent pleadings filed in the action.

Please refer to the General Order - Imaging located on the San Diego Superior Court website at:

<http://www.sdcourt.ca.gov/CivilImagingGeneralOrder>